


IN WITNESS WHEREOF, the undersigned have caused this Settlement

Agreement to be executed as of the dates set forth below:

FOR THE FREY DEFENDANTS:

FOR THE RANDOM HOUSE DEFENDANTS:

  
James Frey

\_\_\_\_\_  
Robert Sorrentino  
Senior Vice President, Taxes, Random House, Inc.

Date: 1/2/07

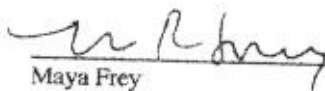
Date: \_\_\_\_\_

  
James Frey  
Big Jim Industries, Inc.

\_\_\_\_\_  
Robert Sorrentino  
President, Doubleday & Company, Inc.

Date: 1/2/07

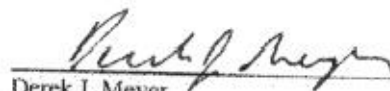
Date: \_\_\_\_\_

  
Maya Frey

\_\_\_\_\_  
Robert Sorrentino  
Vice President, Taxes, Random House VG, Inc.

Date: 1/2/07

Date: \_\_\_\_\_

  
Derek J. Meyer  
McDermott Will & Emery LLP  
227 West Monroe Street, Suite 4400  
Chicago, Illinois 60606  
*Attorney for the Frey Defendants*

\_\_\_\_\_  
Mark B. Blocker  
Sidley Austin LLP  
One South Dearborn  
Chicago, Illinois 60603  
*Attorney for the Random House Defendants*

Date: 1/2/07

Date: \_\_\_\_\_

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James Frey

Date: \_\_\_\_\_

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James Frey  
Big Jim Industries, Inc.

Date: \_\_\_\_\_


\_\_\_\_\_  
Maya Frey

Date: \_\_\_\_\_

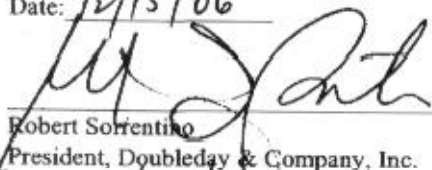
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Derek J. Meyer  
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*Attorney for the Frey Defendants*

Date: \_\_\_\_\_

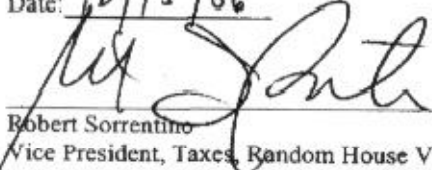
FOR THE RANDOM HOUSE DEFENDANTS:

  
\_\_\_\_\_  
Robert Sorrentino  
Senior Vice President, Taxes, Random House, Inc.


Date: 12/15/06

  
\_\_\_\_\_  
Robert Sorrentino  
President, Doubleday & Company, Inc.

Date: 12/15/06

  
\_\_\_\_\_  
Robert Sorrentino  
Vice President, Taxes, Random House VG, Inc.

Date: 12/15/06

  
\_\_\_\_\_  
Mark B. Blocker  
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*Attorney for the Random House Defendants*

Date: 12/28/2006

**FOR THE PLAINTIFFS:**

Marcia Vedral  
Plaintiff Marcia Vedral

Date: 12-6-06  
Larry D. Drury  
Larry D. Drury, Ltd.  
205 W. Randolph Street, Suite 1430  
Chicago, Illinois 60606  
*Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Marcia Vedral*

Date: 12-6-06  
Plaintiff Jennifer Cohn

Date: \_\_\_\_\_  
Thomas Mullaney  
708 Third Avenue, Suite 2500  
New York, New York 10017  
Phone: (212) 223-0800  
*Liaison Class Counsel  
Attorneys for Plaintiff Jennifer Cohn*

Date: \_\_\_\_\_

Michele Snow  
Plaintiff Michele Snow

Date: 12-6-06  
Evan J. Smith  
Evan J. Smith, Esquire  
Brodsky & Smith, LLC  
Two Bala Plaza, Suite 602  
Bala Cynwyd, PA 19004  
(610) 667-6200  
*Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Michele Snow*

Date: 12-6-06  
Plaintiff Ann Marie Strack

Date: \_\_\_\_\_  
Thomas A. Zimmerman, Jr.  
Zimmerman and Associates, P.C.  
100 West Monroe Street, Suite 1300  
Chicago, Illinois 60603  
*Attorney for Plaintiff Ann Marie Strack*

Date: \_\_\_\_\_

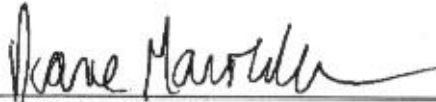
**FOR THE PLAINTIFFS:**

\_\_\_\_\_  
Plaintiff Marcia Vedral

Date: \_\_\_\_\_

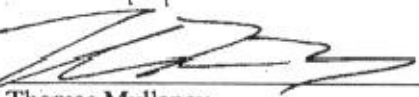
\_\_\_\_\_  
Larry D. Drury  
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*Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Marcia Vedral*

Date: \_\_\_\_\_



\_\_\_\_\_  
Plaintiff Diane Marolda

Date: 12/7/06

  
\_\_\_\_\_  
Thomas Mullaney  
708 Third Avenue, Suite 2500  
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Phone: (212) 223-0800  
*Liaison Class Counsel  
Attorneys for Plaintiff Diane Marolda*

Date: 12.5.2006

\_\_\_\_\_  
Plaintiff Michele Snow

Date: \_\_\_\_\_

\_\_\_\_\_  
Evan J. Smith, Esquire  
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(610) 667-6200  
*Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Michele Snow*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Ann Marie Strack

Date: \_\_\_\_\_

\_\_\_\_\_  
Thomas A. Zimmerman, Jr.  
Zimmerman and Associates, P.C.  
100 West Monroe Street, Suite 1300  
Chicago, Illinois 60603  
*Attorney or Plaintiff Ann Marie Strack*

Date: \_\_\_\_\_

**FOR THE PLAINTIFFS:**

\_\_\_\_\_  
Plaintiff Marcia Vedral

\_\_\_\_\_  
Plaintiff Michele Snow

Date: \_\_\_\_\_

Date: \_\_\_\_\_

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Larry D. Drury  
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Attorney for Plaintiff Marcia Vedral*

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(610) 667-6200  
*Proposed Co-Lead Class Counsel  
Attorney for Plaintiff Michele Snow*

Date: \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jennifer Cohn

\_\_\_\_\_  
  
Plaintiff Ann Marie Strack

Date: \_\_\_\_\_

Date: 12-8-06

\_\_\_\_\_  
Thomas Mullaney  
708 Third Avenue, Suite 2500  
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Phone: (212) 223-0800  
*Liaison Class Counsel  
Attorneys for Plaintiff Jennifer Cohn*


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Chicago, Illinois 60603  
*Attorney or Plaintiff Ann Marie Strack*

Date: \_\_\_\_\_

Date: 12-11-2006

  
\_\_\_\_\_  
Plaintiff Jimmy Floyd

Date: 1/4/07

  
\_\_\_\_\_  
Alan S. Ripka  
Napoli Bern Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: December 5, 2006

\_\_\_\_\_  
Plaintiff Pilar More

Date: \_\_\_\_\_

\_\_\_\_\_  
Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Sara Brackenrich

Date: \_\_\_\_\_

\_\_\_\_\_  
Vincent L. DiTommaso  
DiTommaso & Lubin, PC  
17W 220 22nd Street, Suite 200  
Oakbrook Terrace, Illinois 61081  
*Attorney for Plaintiff Sara Brackenrich*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jill Giles

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan J. Statman  
Colleen M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Shera Paglinawan

Date: \_\_\_\_\_

\_\_\_\_\_  
Michael David Myers  
Myers & Company, P.L.L.C.  
1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paglinawan*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

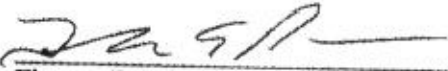
\_\_\_\_\_  
Alan S. Ripka  
Napoli Bern Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: 11/29/06



\_\_\_\_\_  
Plaintiff Pilar More

Date: 11/29/06



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Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
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Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Sara Brackenrich

Date: \_\_\_\_\_

\_\_\_\_\_  
Vincent L. DiTommaso  
DiTommaso & Lubin, PC  
17W 220 22nd Street, Suite 200  
Oakbrook Terrace, Illinois 61081  
*Attorney for Plaintiff Sara Brackenrich*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jill Giles

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan J. Statman  
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255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Shera Paglinawan

Date: \_\_\_\_\_

\_\_\_\_\_  
Michael David Myers  
Myers & Company, P.L.L.C.  
1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paglinawan*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan S. Ripka  
Napoli Born Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Pilar More

Date: \_\_\_\_\_

\_\_\_\_\_  
Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
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*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jill Giles

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan J. Statman  
Colleen M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Shera Paglinawan

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Wendy Shaw

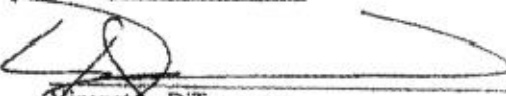
Date: \_\_\_\_\_

\_\_\_\_\_  
Michael David Myers  
Myers & Company, P.L.L.C.  
1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paglinawan*

Date: \_\_\_\_\_

  
\_\_\_\_\_  
Plaintiff Sara Brackenrich

Date: 20 Nov. 06

  
\_\_\_\_\_  
Vincent DiTommaso  
DiTommaso & Lubin, PC



\_\_\_\_\_  
Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan S. Ripka  
Napoli Bern Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Pilar More

Date: \_\_\_\_\_

\_\_\_\_\_  
Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Sara Brackentich

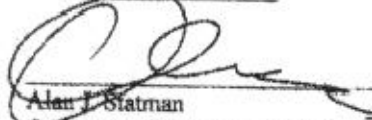
Date: \_\_\_\_\_

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Vincent L. DiTommaso  
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*Attorney for Plaintiff Sara Brackentich*

Date: \_\_\_\_\_

*Jill Giles / by her attorney R.C. Aust*  
\_\_\_\_\_  
Plaintiff Jill Giles

Date: 12-7-06

  
\_\_\_\_\_  
Alan J. Statman  
Colleen M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*

Date: 12-7-06

\_\_\_\_\_  
Plaintiff Shera Paginawan

Date: \_\_\_\_\_

\_\_\_\_\_  
Michael David Myers  
Myers & Company, P.L.L.C.  
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*Attorney for Plaintiff Shera Paginawan*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan S. Ripka  
Napoli Bern Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: \_\_\_\_\_

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Plaintiff Pilar More

Date: \_\_\_\_\_

\_\_\_\_\_  
Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
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*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Sara Brackenrich

Date: \_\_\_\_\_

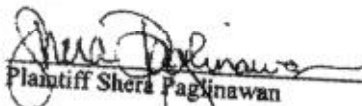
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Vincent L. DiTommaso  
DiTommaso & Lubin, PC

\_\_\_\_\_  
Plaintiff Jill Giles

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan J. Statman  
Colleen M. Hegge (of counsel)  
2900 Chemed Center  
255 East Fifth Street  
Cincinnati, Ohio 45202  
*Attorneys for Plaintiff Jill Giles*


Date: \_\_\_\_\_

\_\_\_\_\_  
  
Plaintiff Shera Paglinawan

Date: 3 Dec. 2006

\_\_\_\_\_  
Plaintiff Wendy Shaw

Date: \_\_\_\_\_

\_\_\_\_\_  
  
Michael David Myers  
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1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paglinawan*

Date: 12.3.2006

\_\_\_\_\_  
Plaintiff Jimmy Floyd

Date: \_\_\_\_\_

\_\_\_\_\_  
Alan S. Ripka  
Napoli Bern Ripka LLP  
115 Broadway  
New York, New York 10006  
*Attorney for Plaintiff Jimmy Floyd*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Pilar More

Date: \_\_\_\_\_

\_\_\_\_\_  
Thomas E. Pakenas  
Dale and Pakenas  
641 W. Lake Street, Suite 400  
Chicago, Illinois 60661  
*Attorneys for Plaintiff Pilar More*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Sara Brackenrich

Date: \_\_\_\_\_

\_\_\_\_\_  
Vincent L. DiTommaso  
DiTommaso & Lubin, PC

\_\_\_\_\_  
Plaintiff Jill Giles

Date: \_\_\_\_\_

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Alan J. Statman  
Collect M. Hegge (of counsel)  
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*Attorneys for Plaintiff Jill Giles*

Date: \_\_\_\_\_

\_\_\_\_\_  
Plaintiff Shera Paginawan

Date: \_\_\_\_\_

\_\_\_\_\_  
  
Plaintiff Wendy Shaw

Date: 12/2/06

\_\_\_\_\_  
Michael David Myers  
Myers & Company, P.L.L.C.  
1809 Seventh Avenue, Suite 700  
Seattle, Washington 98101  
*Attorney for Plaintiff Shera Paginawan*

Date: \_\_\_\_\_