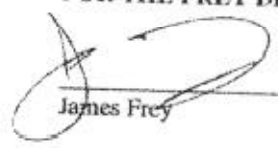


IN WITNESS WHEREOF, the undersigned have caused this Settlement

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

FOR THE FREY DEFENDANTS:

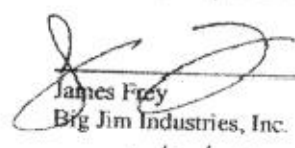
FOR THE RANDOM HOUSE DEFENDANTS:


James Frey

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

Date: 1/2/07

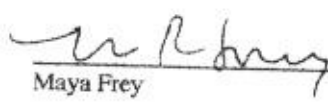
Date: _____


James Frey
Big Jim Industries, Inc.

Robert Sorrentino
President, Doubleday & Company, Inc.

Date: 1/2/07

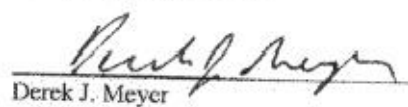
Date: _____


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: _____

IN WITNESS WHEREOF, the undersigned have caused this Settlement

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

FOR THE FREY DEFENDANTS:

James Frey

Date: _____

James Frey
Big Jim Industries, Inc.

Date: _____


Maya Frey

Date: _____

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

Date: _____

FOR THE RANDOM HOUSE DEFENDANTS:



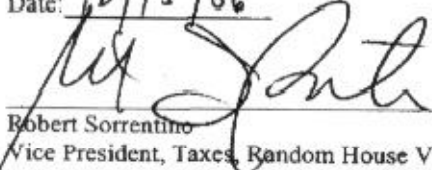
Robert Sorrentino
Senior Vice President, Taxes, Random House, Inc.

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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One South Dearborn
Chicago, Illinois 60603
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: _____

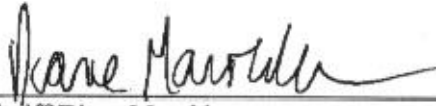
FOR THE PLAINTIFFS:

Plaintiff Marcia Vedral

Date: _____

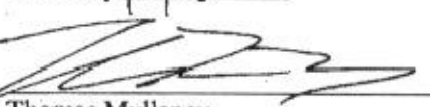
Larry D. Drury
Larry D. Drury Ltd.
205 W. Randolph Street, Suite 1430
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*Proposed Co-Lead Class Counsel
Attorney for Plaintiff Marcia Vedral*

Date: _____



Plaintiff Diane Marolda

Date: 12/7/06



Thomas Mullaney
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New York, New York 10017
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*Liaison Class Counsel
Attorneys for Plaintiff Diane Marolda*

Date: 12.5.2006

Plaintiff Michele Snow

Date: _____

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Two Bala Plaza, Suite 602
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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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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


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New York, New York 10017
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Attorneys for Plaintiff Jennifer Cohn


Thomas A. Zimmerman, Jr.
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Date: _____

Date: 12-11-2006



Plaintiff Jimmy Floyd
Date: 1/4/07


Alan S. Ripka
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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
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Date: _____

Plaintiff Sara Brackenrich

Date: _____

Vincent L. DiTommaso
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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)
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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: _____

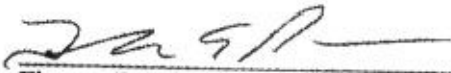
Alan S. Ripka
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115 Broadway
New York, New York 10006
Attorney for Plaintiff Jimmy Floyd

Date: 11/29/06



Plaintiff Pilar More

Date: 11/29/06



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Plaintiff Sara Brackenrich

Date: _____

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Plaintiff Jill Giles

Date: _____

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Plaintiff Shera Paglinawan

Date: _____

Michael David Myers
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Plaintiff Jimmy Floyd

Date: _____

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Date: _____

Plaintiff Pilar More

Date: _____

Thomas E. Pakenas
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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: _____

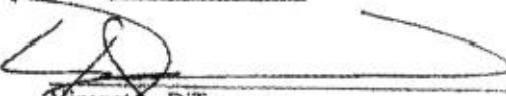
Michael David Myers
Myers & Company, P.L.L.C.
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Date: _____



Plaintiff Sara Brackenrich

Date: 20 Nov. 06



Vincent DiTommaso
DiTommaso & Lubin, PC

Plaintiff Jimmy Floyd

Date: _____

Alan S. Ripka
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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: _____

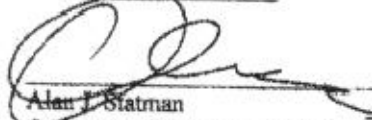
Vincent L. DiTommaso
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Oakbrook Terrace, Illinois 61081
Attorney for Plaintiff Sara Brackentich

Date: _____

Jill Giles / by her attorney A.J.C. Aust

Plaintiff Jill Giles

Date: 12-7-06



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Date: 12-7-06

Plaintiff Shera Paginawan

Date: _____

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Seattle, Washington 98101
Attorney for Plaintiff Shera Paginawan

Date: _____

Plaintiff Jimmy Floyd

Date: _____

Alan S. Ripka
Napoli Bern Ripka LLP
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Attorney for Plaintiff Jimmy Floyd

Date: _____

Plaintiff Pilar More

Date: _____

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Dale and Pakenas
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Attorneys for Plaintiff Pilar More

Date: _____

Plaintiff Sara Brackenrich

Date: _____


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
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Date: _____


Plaintiff Shera Paglinawan

Date: 3 Dec. 2006

Plaintiff Wendy Shaw

Date: _____


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1809 Seventh Avenue, Suite 700
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Date: 12.3.2006

Plaintiff Jimmy Floyd

Date: _____

Alan S. Ripka
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115 Broadway
New York, New York 10006
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Date: _____

Plaintiff Pilar More

Date: _____

Thomas E. Pakenas
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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: _____

Alan J. Statman
Collect M. Hegge (of counsel)
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Date: _____

Plaintiff Shera Paginawan

Date: _____


Plaintiff Wendy Shaw

Date: 12/2/06

Michael David Myers
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Seattle, Washington 98101
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Date: _____