

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

PEOPLE FIRST OF TENNESSEE, )
)
Plaintiffs, )
)
v. ) Civil Action No. 3:95-1227
) Judge Sharp
) Magistrate Judge Brown
CLOVER BOTTOM DEVELOPMENTAL ) (Cons. w/3:96-1056)
CENTER, et al. )
)
Defendants. )

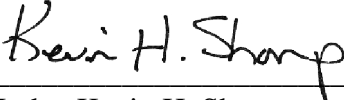
PROPOSED AGREED ORDER ON JOINT APPLICATION FOR
AWARD OF ATTORNEY'S FEES AND REIMBURSEMENT OF
EXPENSES TO THE PARENT GUARDIAN ASSOCIATIONS

The Intervenor Parent Guardian Associations (the "PGA) and the State of Tennessee have
filed a Joint Application For Award of Attorney's Fees and Reimbursement of Expenses to the
PGA. The PGA are "prevailing parties"entitled to awards of expenses and reasonable attorney's
fees in this case. The parties have agreed that One Hundred Twenty-Two Thousand Six Hundred
Eighty-Five and No/100 Dollars (\$122,685.00) for attorney's fees and One Thousand One
Hundred Eighteen and 75/100 Dollars (\$1,118.75) for expenses, which collectively represents an
aggregate award of One Hundred Twenty-Three Thousand Eight Hundred Three and 75/100
Dollars (\$123,803.75), represents an appropriate award of attorney's fees and expenses for
monitoring and enforcement related work during the period from July 1, 2010 through June 30,
2013.

Accordingly, it is hereby ordered that the Intervenor PGA are awarded attorney's fees and
expenses in the aggregate amount of One Hundred Twenty-Three Thousand Eight Hundred Three

and 75/100 Dollars (\$123,803.75). Based on the statements made in the joint application, this award shall be in satisfaction of hours expended and costs incurred in connection with the PGA's monitoring and enforcement work during the period from July 1, 2010 through June 30, 2013.

It is so ORDERED.

  
\_\_\_\_\_  
Judge Kevin H. Sharp  
United States District Judge

APPROVED FOR ENTRY:

s/ Martha A. Campbell  
\_\_\_\_\_  
Martha A. Campbell  
Deputy Attorney General  
Office of the Attorney General & Reporter  
425 Fifth Avenue North / P.O. Box 20207  
Nashville, TN 37243  
(615) 741-6420

s/ Jonathan P. Lakey  
\_\_\_\_\_  
Jonathan P. Lakey (BPR #16788)  
PIETRANGELO COOK  
6410 Poplar Avenue, Suite 190  
Memphis, TN 38119  
(901) 685-2662

Attorneys for the State of Tennessee

s/ Dudley M. West  
\_\_\_\_\_  
Dudley M. West (BPR #9083)  
WHITE & REASOR, PLC  
One American Center, Suite 1100  
3100 West End Avenue  
Nashville, TN 37203  
(615) 383-3345

Attorneys for the Intervenor Parent-Guardian  
Associations of Clover Bottom and Greene Valley  
Developmental Centers

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2013, I caused copies of the foregoing Agreed Order on Joint Application for Award of Attorney's Fees and Expenses to the Parent Guardian Associations to be served upon the following counsel via the Court's electronic filing system or by first class mail, postage prepaid:

Dianne Stamey Dycus  
Martha A. Campbell  
Deputy Attorney General  
Office of the Attorney General & Reporter  
425 Fifth Avenue North / P.O. Box 20207  
Nashville, TN 37243

Jonathan P. Lakey  
PIETRANGELO COOK  
6410 Poplar Avenue, Suite 190  
Memphis, TN 38119  
**Attorneys for the State of Tennessee**

R. Jonas Geissler  
Senior Trial Attorney  
Special Litigation Section  
Civil Rights Division  
U.S. Department of Justice  
Patrick Henry Building  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530-0001  
**Attorney for the United States**

Jack W. Derryberry, Jr.  
Derryberry & Derryberry  
2400 Crestmoor Road  
Nashville, TN 37215  
**Attorney for People First of Tennessee**

s/ Dudley M. West