

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

BRIAN A., et al.)	
)	
Plaintiffs,)	Civ. Act. No. 3:00-0445
)	Judge Todd J. Campbell
v.)	Magistrate Judge Joe B. Brown
)	
BILL HASLAM, et al.)	
)	
Defendants.)	

**JOINT STIPULATION SEEKING COURT APPROVAL OF PROPOSED JULY 2011
MODIFIED SETTLEMENT AGREEMENT AND EXIT PLAN**

1. Pursuant to Section XVIII.C.3 of the 2010 Modified Settlement Agreement and Exit Plan (Dkt. 411), which remains in full force and effect, the parties hereby jointly file with the Court a proposed joint modification to the 2010 Modified Settlement Agreement and Exit Plan that includes any revised identification of provisions as MAINTENANCE.
2. If approved, the proposed July 2011 Modified Settlement Agreement and Exit Plan (attached hereto as Exhibit A) will replace and supersede the 2010 Modified Settlement Agreement and Exit Plan in its entirety. The parties request that the July 2011 Modified Settlement Agreement and Exit Plan be signed by the Court and entered as a separate docket entry in this action.

DATED: July 11, 2011

APPROVED FOR ENTRY:

ATTORNEYS FOR PLAINTIFFS:

/s/ Marcia Robinson Lowry

MARCIA ROBINSON LOWRY (*pro hac vice*)

IRA LUSTBADER (*pro hac vice*)
MELISSA COHEN (*pro hac vice*)
CHILDREN'S RIGHTS, INC.
330 Seventh Avenue, 4th Floor
New York, NY 10001
(212) 683-2210

/s/ David L. Raybin
DAVID L. RAYBIN (TN BPR #003385)
HOLLINS, RAYBIN AND WEISSMAN P.C.
Suite 2200, Fifth Third Center
424 Church Street
Nashville, TN 37219
(615) 256-6666

JACQUELINE B. DIXON (TN BPR #012054)
WEATHERLY, MCNALLY AND DIXON, P.L.C.
Suite 2260
424 Church Street
Nashville, TN 37219
(615) 986-3377

OF COUNSEL FOR PLAINTIFFS:
RICHARD B. FIELDS (TN BPR #4744)
688 Jefferson Avenue
Memphis, TN 38105
(901) 578-7709

ROBERT LOUIS HUTTON (TN BPR #15496)
Glankler Brown, PLLC
Suite 1700, One Commerce Square
Memphis, TN 38103
(901) 525-1322

WADE V. DAVIES (TN BPR #016052)
Ritchie, Dillard and Davies
606 W. Main Street, Suite 300
Knoxville, TN 37902
(865) 637-0661

ATTORNEYS FOR DEFENDANTS:
/s/ Lindsey O. Appiah
LINDSEY O. APPIAH (TN BPR #027069)
Assistant Attorney General
General Civil Division
P.O. Box 20207

Nashville, TN 37202
(615) 741-7630
SO ORDERED:



HONORABLE TODD J. CAMPBELL, U.S.D.J. DATE: