

**FOR SETTLEMENT PURPOSES ONLY.
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PARTIES' CONFIDENTIAL SETTLEMENT DISCUSSIONS**

MEMORANDUM OF UNDERSTANDING

Following numerous settlement conferences before Magistrate Judge James C. Francis, IV arising out of the Republican National Convention lawsuits (the "RNC cases") pending before the Honorable Richard Sullivan in the Southern District Court of New York, the following terms for a settlement are agreed to subject to the parties' agreement on the remaining outstanding terms (e.g., class notice, timing of release of joint media statement, etc.) which the parties will hereafter attempt to resolve in good faith and in an effort to reach a final settlement agreement incorporating the agreed-upon terms.

1. The following plaintiffs are parties to this settlement agreement:

- (a) The 430 plaintiffs identified in the list annexed hereto as **Exhibit A** [collectively, the "Grid Plaintiffs"];
 - (b) The 5 plaintiffs identified in the April 8, 2013 letter from Michael Spiegel to the Court, specifically plaintiffs Hacer Dinler, Kate Freitag, Valerie Kaur-Brar, Kathleen O'Reilly and Joshua Russell (collectively, the "5 Outlier Plaintiffs") — as to attorneys' fees, costs and expenses only;
 - (c) The four (4) non-accepting plaintiffs identified in the October 10, 2013 letter to the Court, specifically Andrew St. Laurent, Steve Ekberg, Robert Seigel, and Howard Gale (collectively, the "4 Non-Accepting Plaintiffs") — as to attorneys' fees, costs and expenses only.
-
- (d) All named plaintiffs and all class members (in all certified classes) in the case of *MacNamara v. City of New York*, 04-cv-9216 (the "Class Plaintiffs").

2. The City agrees to pay the following in consideration for the dismissal and release of all claims of the Grid Plaintiffs and the Class Plaintiffs, including claims for attorneys' fees, costs and expenses, and dismissal and release of any claims for fees, costs, and expenses to the date of this Memorandum of Understanding by the 5 Outlier Plaintiffs and the 4 Non-Accepting Plaintiffs:

- (a) \$6,345,869 in total to the Grid Plaintiffs, as set forth in the attached **Exhibit A**.
- (b) \$5,001,011 in total to all counsel for the Grid Plaintiffs, the 5 Outlier Plaintiffs, and the 4 Non-Accepting Plaintiffs, as set out in the attached **Exhibit B** for any and all attorneys' fees, costs and expenses

related to these RNC cases. The 5 Outlier Plaintiffs and the 4 Non-Accepting Plaintiffs do not release their claims for attorneys' fees, costs and expenses incurred, if any, after the date of this Memorandum of Understanding.

- (c) \$6.6 million in total to the Class Plaintiffs and Class Counsel (the "Class Fund"). Defendant City is entitled to 100% reversion on all unclaimed monies by the Class.
- (d) The Class Fund shall be paid as follows:
 - i. \$4 million to the Class Plaintiffs, subject to 100% reversion to the City for all unclaimed monies.
 - ii. \$2.6 million to class counsel Beldock, Levine, and Hoffman LLP ("BLH") and Moore & Goodman LLP ("M&G") for all attorneys' fees, costs and expenses and costs of class administration.
 - iii. All attorneys' fees, costs and expenses related to the litigation of the two separate lawsuits brought by BLH on behalf of Brian Portera and Jessica Rechtschaffer are included in, and satisfied by, the payment of attorneys' fees to BLH and M&G in the Class Fund.

3. Payments made by the defendant City to plaintiffs and counsel will be made in individual amounts. With regard to dispersal of attorneys' fees, the City agrees that some of the fees may be structured, and any counsel requesting structured dispersal shall prepare and submit necessary paperwork to the City regarding such dispersal.

4. The attached Final Joint Statement (Exhibit C) shall be released to the media at an agreed-upon date and time after endorsement of the first Stipulation of Settlement by the district court judge, and it shall not be released before such agreed-upon date and time. Furthermore, no counsel for the parties to this agreement shall make any unilateral statements to the media related to the RNC litigation or the settlement thereof before such agreed-upon date and time.

5. The terms of the Stipulation of Settlement shall contain, *inter alia*, the settlement clauses contained in the form settlement agreement used by the Special Federal Litigation Division at the time the plaintiffs' cases commenced (releasing the defendants from claims "which were or could have been alleged in this action"), including but not limited to, that there is no admission of liability by either side and that the stipulation shall not be admissible in, nor is it related to, any other litigation or settlement negotiations. Plaintiffs shall not be required to submit Affidavits re. Status of Liens. However, the proceeds of the settlement for all plaintiffs are subject to all applicable liens.

6. Notice to Class Members. Such notice will be subject to the City's approval and will include, *inter alia*, the necessity to file a claim within a specified time period.

7. This settlement does not include the following seven (7) plaintiffs in any respect: Kaitlyn Tikkun, Yusuke Banno, Brian Conley, Noel Grosso, Matthew Smith, Annette Karlin, and Joseph Carranza (collectively, "Non-Participating Plaintiffs").

8. Plaintiffs Michael Schiller, Francesca Fiorentini, Robert Curley, and Neal Curley (*Schiller v. City of New York*, 04-cv-7922), as well as Ashley Waters and Anne Mauer (*Dinler v. City of New York*, 04-cv-7921), agree to accept the terms herein given the Defendants' representation that they will not reinstate any of the RNC appeals pending in the Second Circuit (lead case *Bell, et al. v. City of New York, et al.*, 12-cv-4420), which were withdrawn by defendants. At the time the settlement documents are filed for these plaintiffs, the Defendants agree to notify the Second Circuit in writing that they will not be reinstating the appeals. Nothing herein shall limit any future appeal by Defendants in the remaining cases of the Outlier Plaintiffs, Non-Accepting Plaintiffs, or Non Participating Plaintiffs.

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Dated: New York, New York

~~November~~, 2013

December 9,

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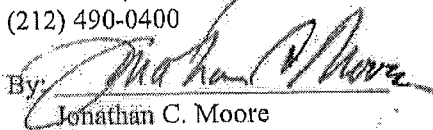
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Dated: New York, New York
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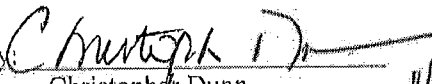
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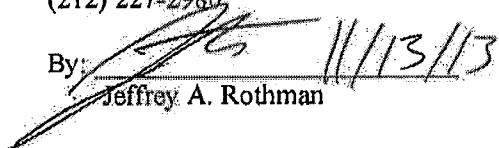
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November , 2013

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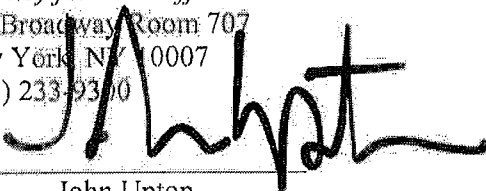
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