

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Civil No. 12-cv-3065 (JRT/TNL)

Public Record Media, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	<b>STIPULATION FOR</b>
	)	<b>SETTLEMENT</b>
U.S. Department of Health and	)	
Human Services,	)	
	)	
Defendant.	)	

It is hereby stipulated by and between Plaintiff Public Record Media, LLC and Defendant U.S. Department of Health and Human Services, by and through their respective attorneys, as follows:

1. The parties do hereby agree to settle and compromise the above-entitled action under the terms and conditions set forth herein.
2. Defendant U.S. Department of Health and Human Services agrees to pay to Plaintiff Public Record Media, LLC the sum of two thousand five hundred dollars (\$2,500) (settlement amount) representing Plaintiff Public Record Media, LLC's attorney's fees, costs, and litigation expenses in connection with the above-captioned matter. This settlement amount shall be in full and complete settlement and satisfaction of any and all claims, demands, rights, and causes of action Plaintiff, its assignees, or attorneys may have for attorney's fees, costs, and expenses in the above-styled action, and is inclusive of any interest.

3. Payment of the settlement amount will be made by the United States Department of Health and Human Services, Centers for Medicare & Medicaid Services Office of Financial Management by electronic funds transfer (EFT) payable to Public Record Media, LLC, based on EFT transfer information provided by Plaintiff Public Record Media, LLC.

4. In consideration of the payment of the settlement amount as set forth above, Plaintiff Public Record Media, LLC agrees to make no further challenge of any kind regarding the Freedom of Information Act request underlying this lawsuit (FOIA request control number 030720127082, PIN W767), or the government's response thereto. Plaintiff Public Record Media, LLC further agrees that within three (3) business days after receiving the settlement amount, it will execute and provide to Defendant's attorney a release in the form attached hereto as Exhibit A. Plaintiff Public Record Media, LLC further agrees that within three (3) business days after receiving the settlement amount it will execute such documents necessary to cause the above-styled action to be dismissed in its entirety with prejudice from the docket of the Court.

5. This stipulation shall not constitute an admission of liability or fault on the part of the United States, the U.S. Department of Health and Human Services, its agencies, or employees, and is entered into by both parties for the purpose of compromising disputed claims and avoiding the expenses and risks of litigation.

6. This stipulation is binding upon and inures to the benefit of the parties hereto and their respective successors and assigns.

Dated: May 20, 2013

s/ JT Haines  
JT HAINES  
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St. Paul, MN 55114

[REDACTED]  
[REDACTED]  
Attorney for Plaintiff

Dated: May 20, 2013

B. TODD JONES  
United States Attorney

s/ Ann M. Bildtsen  
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