

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

PRISON LEGAL NEWS and)
HUMAN RIGHTS DEFENSE CENTER,)
Plaintiffs,)

Case No.: 2:10-cv-02594-MBS

vs.)

BERKELEY COUNTY SHERIFF)
H. WAYNE DEWITT, individually and)
in his official capacity; CAPTAIN)
CLIFF McELVOGUE, individually and in)
his official capacity; LIEUTENANT)
TONY RILEY, individually and in his)
official capacity; JOHN DOE 1,)
Berkeley County Detention Center)
employee, individually and in his/her)
official capacity; JOHN DOE 2,)
Berkeley County Detention Center)
employee, individually and in his/her)
official capacity; JOHN DOE 3,)
Berkeley County Detention Center)
employee, individually and in his/her)
official capacity; JOHN DOE 4,)
Berkeley County Detention Center)
employee, individually and in his/her)
official capacity,)
Defendants.)

SETTLEMENT AGREEMENT

PLAINTIFFS AND DEFENDANTS AGREE AS FOLLOWS:

Defendants shall pay, and plaintiffs shall accept, the sum of \$100,000.00 in full and final settlement of all plaintiffs' claims for damages in the above-captioned action.

Defendants shall pay, and plaintiffs shall accept, the sum of \$499,900.00 in full and final settlement of all plaintiffs' claims for attorney fees and costs incurred ^{in the above-captioned action} through the date of the Court's approval of the Consent Injunction in this case.

DATED: January 10, 2012

FOR PLAINTIFFS



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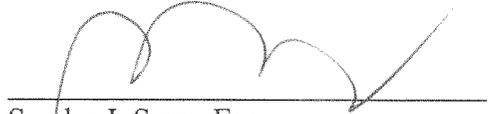
**Not admitted in DC; practice limited to federal courts*

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FOR DEFENDANTS:

A handwritten signature in black ink, appearing to read "H. Wayne DeWitt", written over a horizontal line.

H. Wayne DeWitt
Sheriff of Berkeley County, South Carolina

A handwritten signature in black ink, appearing to read "Sandra J. Senn", written over a horizontal line.

Sandra J. Senn, Esq.
Attorney for Defendants