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VIA E-MAIL

Deborah M. Golden, Esq.
Staff Attorney
Human Rights Defense Center
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Robert Appel, Esq.
30 Main Street
Suite 350
Burlington, VT 05401
robert@robertappellaw.com

Re: Human Rights Defense Center v. GEO Group, Inc. No. 272-5-18 Wncr

Dear Deborah and Robert:

I hope this finds you well. This letter is intended to memorialize our mutual understandings as we finalize the above referenced matter.

As I understand it, we have agreed that GEO Group, Inc. will pay Three Thousand, Four Hundred and Forty-Four dollars (\$3,444.00) to Human Rights Defense Center, and Three Thousand Four Hundred Twenty-One dollars and nine cents (\$3,421.09) to Robert Appel, Attorney at Law, PLC. The Parties will then file the accompanying "Stipulation And Proposed Order of Dismissal" with the Court. Once the Court endorses that document, the matter will be concluded as to the merits, and the issue of fees and costs.

If you agree with what I have set forth here, please date and sign this letter, and the stipulation, and return them to me for execution, and the filing of the stipulation.

Please know that I have requested checks for the amounts referenced, and will not file the stipulation until I know that you have received the funds. Please contact me with any questions or concerns. Thank you very much.

Very truly yours,


Joseph A. Farnham
Counsel for GEO Group, Inc.

cc: B Johnson (e-mail only)
600663-147

Agreed to this 6th day of February, 2019.

Deborah M. Golden by RJA
Deborah M. Golden,
Counsel for Human Rights Defense *with*
Center *PERMISSION*

Agreed to this 7th day of February, 2019.

Robert Appel
Robert Appel,
Counsel for Human Rights Defense
Center

STATE OF VERMONT

SUPERIOR COURT
CIVIL DIVISION

WASHINGTON UNIT
DOCKET No. 272-5-18 Wncv

HUMAN RIGHTS DEFENSE
CENTER,

Plaintiff

v.

GEO GROUP, INC.,

Defendant.

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STIPULATION AND PROPOSED ORDER OF DISMISSAL

NOW COME the parties, by and through their respective counsel, jointly and respectfully stipulating to the dismissal of this action with prejudice pursuant to V.R.C.P. 41 (a)(1)(ii), with the parties having agreed as to the issue of attorney fees and costs.

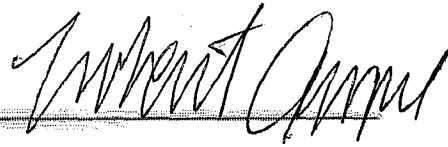
Dated February 12th 2019.

DEBORAH M. GOLDEN
Pro Hac Vice
Counsel for Plaintiff
Human Rights Defense Center

Deborah M. Golden by RA
with permission

Dated February ^{5th} __, 2019

ROBERT APPEL
Counsel for Plaintiff
Human Rights Defense Center



Dated February __, 2019

JOSEPH A. FARNHAM
Counsel for Defendant
GEO Group, Inc.

So ORDERED, this __ day of February 2019.

Hon. Mary Miles Teachout,
Presiding Judge

600663-147