

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

SUPERIOR COURT  
C.A. NO. 00-2163-E

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JULIE NETHERLAND, )  
CAITLIN FARREN )  
Plaintiffs )  
)  
vs. )  
)  
SCOTT WHITEMAN, )  
BRIAN CAMENKER, )  
PARENTS RIGHTS COALITION )  
of MASSACHUSETTS )  
Defendants )

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**SETTLEMENT AGREEMENT**

Plaintiffs Julie Netherland and Caitlin Farren and defendants Scott Whiteman and Parents Rights Coalition of Massachusetts (PRC) agree as follows:

1. Defendant Scott Whiteman agrees that he will not disclose or distribute to any person or entity, including Defendants Brian Camenker or PRC, the original audiotapes or any copies thereof of any workshop held at the Teach-Out Conference on March 25, 2000 at Tufts University sponsored by GLSEN and Project 10 East (hereinafter referred to as "the tape").

2. Plaintiffs Netherland and Farren release, acquit, and forever discharge defendants Whiteman, Camenker and PRC, their representatives, employees, officers, agents, successors, and assigns, from any and all claims, debts, actions, causes of action and demands of every name and nature, known or unknown, both in law and equity, which they had, now have, or now may have against defendants Whiteman, camenker and PRC, including all claims in any way related to the tape recording of workshops at

the Teach-Out Conference on March 25, 2000 at Tufts University and without limiting the foregoing, any contract or tort laws, rules and/or regulations or any claim arising under common law, such as claims for defamation, breach of implied covenant of good faith and fair dealing, misrepresentation, malicious prosecution, libel, slander, invasion of privacy, negligence, interference with advantageous relations, or infliction of emotional distress, or any claim arising under the Massachusetts Wiretap Statute.

3. Defendants Scott Whiteman, Brian Camenker and PRC, their representatives, employees, officers, agents, successors, and assigns, forever discharge Plaintiffs Julie Netherland and Caitlin Farren, their representatives, employees, officers, attorneys, agents, successors, and assigns, from any and all claims, debts, actions, causes of action and demands of every name and nature, known or unknown, both in law and equity, which they had, now have, or now may have against them, including all claims in any way related to the tape recording of workshops at the Teach-Out Conference on March 25, 2000 at Tufts University and without limiting the foregoing, any contract or tort laws, rules and/or regulations or any claim arising under common law, such as claims for defamation, breach of implied covenant of good faith and fair dealing, misrepresentation, malicious prosecution, libel, slander, invasion of privacy, negligence, interference with advantageous relations, or infliction of emotional distress.

4. Upon execution of this agreement, plaintiffs will file with the Court a stipulation of dismissal with prejudice of all claims against defendants Whiteman, Camenker and PRC in the form of Exhibit A attached.

**EXHIBIT A**

COMMONWEALTH OF MASSACHUSETTS

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    Defendants )  
                  ) )  

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**STIPULATION OF DISMISSAL**

Pursuant to Massachusetts Rule of Civil Procedure 41 (a) (ii), plaintiffs Julie Netherland and Caitlin Farren and defendants Scott Whiteman, Brian Camenker and Parents Rights Coalition of Massachusetts stipulate that all counts of the Amended Complaint in this action against defendants Whiteman, Camenker and Parents Rights Coalition of Massachusetts only, be dismissed with prejudice and without costs. All parties waive their rights to appeal.

Respectfully submitted,  
JULIE NETHERLAND and  
CAITLIN FARREN

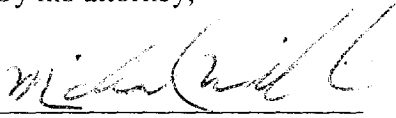
By their attorney

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SCOTT WHITEMAN

By his attorney,

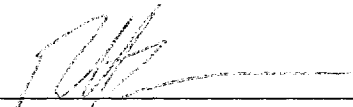


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BRIAN CAMENKER and PARENTS  
RIGHTS COALITION OF  
MASSACHUSETTS and BRIAN  
CAMENKER

By their attorney,



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