

## Terms of Settlement

Rubin Salter (“Fisher Plaintiffs’ Counsel”) and Tucson Unified School District (“Defendant”) (collectively “The Parties”) have agreed to settle all claims related to the dispute regarding Fisher Plaintiffs’ Counsel’s fees and costs from January 1, 2016 through December 31, 2016 arising from United States District Court for the District of Arizona Case Number CV-74-0090-TUC-DCB.

The Parties agree to the following:

1. Defendant shall pay the Fisher Plaintiffs’ Counsel \$145,000.00;
2. This agreement is a release of any and all claims, past and present, arising from or related to the Fisher Plaintiffs’ Counsel’s fees and costs from January 1, 2016 through December 31, 2016;
3. This agreement is contingent upon approval by the Tucson Unified School District Board at the April 25, 2016 meeting; and
4. The Parties agree that Magistrate Judge Macdonald shall retain jurisdiction over any disputes arising from this agreement.

The parties agree to be bound by the terms of this agreement and to execute a stipulation and proposed order to Judge Bury for approval within seven (7) days of TUSD Board approval.

**Rubin Salter, Jr., Esq.**

By: \_\_\_\_\_  
Rubin Salter, Jr., Esq.  
Attorney for the Fisher Plaintiffs

Date: \_\_\_\_\_

**Tucson Unified School District**

By: \_\_\_\_\_  
Samuel E. Brown, Esq.  
Attorney for Defendant

Date: \_\_\_\_\_