

RELEASE AND SETTLEMENT OF CLAIM (ATTORNEY FEES AND COSTS)

FOR THE SOLE CONSIDERATION OF **THREE HUNDRED TWENTY-FIVE THOUSAND DOLLARS AND ZERO CENTS (\$325,000.00)** payable to Lambda Legal Defense and Education Fund, Inc. ("Lambda Legal"), I, Jon W. Davidson, the Legal Director of Lambda Legal, the principal office of which is at 120 Wall Street, 19th Floor, New York, New York 10005-3919, on behalf of myself, Lambda Legal, and all attorneys who provided legal services to or through Lambda Legal in the case in which this release and settlement of claim is executed, do hereby release, acquit and forever discharge PENNY BOGAN, in her official capacity as BOONE COUNTY CLERK; KAREN M. MARTIN, in her official capacity as PORTER COUNTY CLERK; MICHAEL A. BROWN, in his official capacity as LAKE COUNTY CLERK; PEGGY BEAVER, in her official capacity as HAMILTON COUNTY CLERK; WILLIAM C. VANNESS II, M.D., in his official capacity as the COMMISSIONER, INDIANA STATE DEPARTMENT OF HEALTH; and GREG ZOELLER, in his official capacity as INDIANA ATTORNEY GENERAL, and all their present and former officers, agents and employees and their successors in office from all actions, causes of action, claims and demands, damages, costs, loss of services, expenses and compensation on account of or in any way growing out of any and all known and unknown attorney fees, fees, costs and expenses arising out of or accrued in the cause of action styled *Baskin, et al. v. Bogan, et al.*, Cause No. 1:14-cv-00355-RLY-TAB, including without limitation any claims to attorney fees, fees, costs or expenses that were or could have been sought in said lawsuit. I hereby certify that I am authorized to execute this release on behalf of the parties releasing these claims for attorney fees, fees, costs and expenses.

It is expressly warranted by me that no promise or inducement has been offered except as herein set forth; that this release is executed without reliance upon any statement or representation of the parties or persons released or their representatives or attorneys, concerning the nature and extent of the injuries, damages, costs and/or legal liability therefor; that acceptance of the consideration set forth herein is in full accord and satisfaction of a disputed claim for which liability is expressly denied.

It is further warranted by me that the persons released herein do not by this settlement admit liability to me or to Lambda Legal in any way for attorney fees, fees, costs and expenses, and that the persons released herein continue to deny liability, but that they have entered into this settlement solely to avoid the costs and inconvenience of litigation.

I HAVE READ THIS RELEASE AND SETTLEMENT OF CLAIM CAREFULLY AND UNDERSTAND: THAT IT NOW AND FOREVER DISCHARGES ANY OBLIGATION, LIABILITY OR DUTY THE STATE OF INDIANA, ITS AGENCIES, AGENTS, OFFICERS AND EMPLOYEES MAY HAVE TOWARD ME AND TOWARD THOSE ON WHOSE BEHALF I SIGN, AS A RESULT OF THE AFORESAID CIVIL ACTION AND THE ACCRUED ATTORNEY FEES AND COSTS IN THAT CASE, THAT THE AFORESAID PARTIES ADMIT NO LIABILITY BY THIS PAYMENT AND, THAT THIS RELEASE AND SETTLEMENT IS BINDING UPON OUR HEIRS, EXECUTORS, ADMINISTRATORS, ASSIGNS AND SUCCESSORS IN INTEREST.

IN WITNESS WHEREOF, I have hereunto set my hand and seal to this Release and Settlement of Claim on the 10th day of February, 2015.

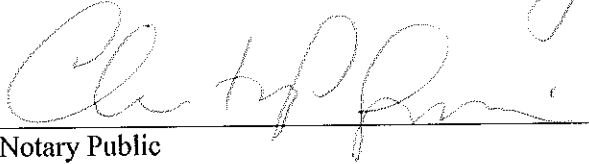


Jon W. Davidson, Legal Director
Lambda Legal Defense and Education Fund, Inc.

ACKNOWLEDGMENT OF RELEASOR

STATE OF CALIFORNIA)
) SS:
COUNTY OF LOS ANGELES)

Before me, a Notary Public in and for said County and State, personally appeared Jon W. Davidson, known to me to be the releasor described hereinabove and executed and/or acknowledged executing the foregoing instrument for the purposes therein stated on this 10th day of February 2015.



Notary Public

My Commission Expires:
1/11/2019

Printed Name: CHRISTOPHER P. GARCIA

County of Residence: LOS ANGELES



A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

Effective January 1, 2015, the above consumer notification must be included as part of the notarial certificates under Chapter 197, Statutes of 2014. Notaries in the Golden State who do not use the new wording will be out of compliance with state law.

This notification must appear in a box at the top of the certificate, and it must be legible.

Notaries encountering documents without the consumer notification will most likely need to attach a loose certificate because there won't be enough room to insert the new wording so that it is legible and in a box. County recorders will likely reject notarized documents that do not include the new certificate wording.

Attached to document: Release and Settlement Claim

Signed by: Jon Warren Davidson

Date: 2/10/2015

Signature of Notary: *Christopher P. Garcia*

Christopher P. Garcia

Commission #2096631

Notary Public – California

Los Angeles County

My Commission Expires January 11, 2019

