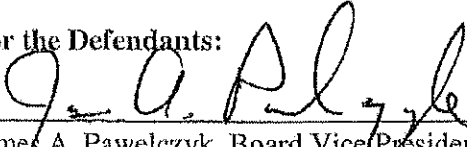


this non-admission of liability statement does not prejudice any defenses the Defendant may otherwise have against any damage claims or claims for attorneys' fees as otherwise may be raised by the Plaintiffs.

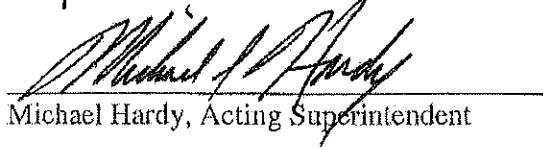
3. Within the next thirty (30) calendar days, the parties will attempt to resolve any outstanding issues as they relate to Plaintiffs' claims for damages and/or attorneys' fees. If the parties cannot resolve the financial aspects of the case within thirty (30) days they will engage ADR (mediation) during the following thirty (30) days, with Defendants paying the ADR fee. If the parties still cannot resolve the outstanding issues through ADR, the Defendants shall file a responsive pleading within twenty (20) days thereafter. The Defendants' obligation to file a responsive pleading under Fed. R. Civ. P. 12 is suspended and shall now be governed by the schedule referenced herein.
4. This Court shall retain jurisdiction to enforce the terms of this Consent Decree for a period of five (5) years from this date.

Signatures on pages 3-4


For the Defendants:



James A. Pawelczyk, Board Vice President




Michael Hardy, Acting Superintendent




Carl P. Beard, Esquire

Signatures continued on next page

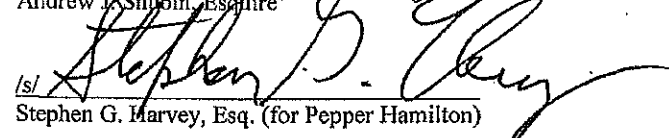
For the Plaintiffs:

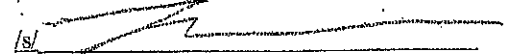

Kerry Weissmann


Beth G. Resko

/s/ 
Witold J. Walczak, Esquire (for ACLU-PA)

/s/ 
Andrew J. Shubin, Esquire

/s/ 
Stephen G. Marvey, Esq. (for Pepper Hamilton)

/s/ 
Leslie Cooper, Esq. (for ACLU)

/s/ 
Justine Andronici, Esq.

IT IS SO ORDERED this ____ day of ____, 2011.

Hon. John E. Jones, III, U.S.D.J.