

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

PRISON LEGAL NEWS and)
HUMAN RIGHTS DEFENSE CENTER,)
Plaintiffs,)

Case No.: 2:10-cv-02594-MBS

vs.)

BERKELEY COUNTY SHERIFF)
H. WAYNE DEWITT, individually and)
in his official capacity; CAPTAIN)
CLIFF McELVOGUE, individually and in)
his official capacity; LIEUTENANT)
TONY RILEY, individually and in his)
official capacity; JOHN DOE 1,)
Berkeley County Detention Center)
employee, individually and in his/her)
official capacity; JOHN DOE 2,)
Berkeley County Detention Center)
employee, individually and in his/her)
official capacity; JOHN DOE 3,)
Berkeley County Detention Center)
employee, individually and in his/her)
official capacity; JOHN DOE 4,)
Berkeley County Detention Center)
employee, individually and in his/her)
official capacity,)
Defendants.)

SETTLEMENT AGREEMENT


PLAINTIFFS AND DEFENDANTS AGREE AS FOLLOWS:

Defendants shall pay, and plaintiffs shall accept, the sum of \$100,000.00 in full and final settlement of all plaintiffs' claims for damages in the above-captioned action.

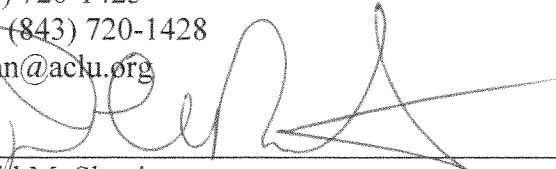
Defendants shall pay, and plaintiffs shall accept, the sum of \$499,900.00 in full and final settlement of all plaintiffs' claims for attorney fees and costs incurred through the date of the Court's approval of the Consent Injunction in this case. ^{in the above-captioned action}

DATED: January 10, 2012

FOR PLAINTIFFS



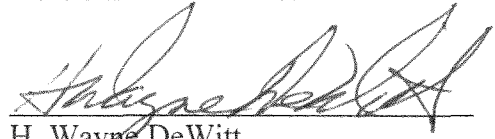
Susan Dunn
Federal Bar No. 647
Staff Attorney
South Carolina National Office of the ACLU
P.O. Box 20998
Charleston, SC 29413-0998
(843) 720-1425
Fax: (843) 720-1428
sdunn@aclu.org



David M. Shapiro
dshapiro@npp-aclu.org
David C. Fathi*
dfathi@npp-aclu.org
ACLU National Prison Project
915 15th St., N.W., 7th Floor
Washington, DC 20005
(202) 715-0838
Fax: (202) 393-4931
**Not admitted in DC; practice limited to federal courts*

Lance Weber
Human Rights Defense Center
P.O. Box 2420
West Brattleboro, VT 05303
(802) 579-1309
Fax: (866) 735-7136
lweber@humanrightsdefensecenter.org

FOR DEFENDANTS:

A handwritten signature in black ink, appearing to read "H. Wayne DeWitt", written over a horizontal line.

H. Wayne DeWitt
Sheriff of Berkeley County, South Carolina

A handwritten signature in black ink, appearing to read "Sandra J. Senn", written over a horizontal line.

Sandra J. Senn, Esq.
Attorney for Defendants