

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MAINE**

Bryan C. and Henry B. through their next friend Michael P. Dixon, <i>et al.</i> ,)	
)	
Plaintiffs,)	
v.)	C/A No. 1:21-cv-00005-NT
Jeanne M. Lambrew in her official capacity as Commissioner of the Maine Department of Health and Human Services, <i>et al.</i> ,)	
)	
Defendants.)	

JOINT AGREEMENT ON MEDIATED FEES

The Parties hereby stipulate and agree to the following, subject to the approval of the United States District Court for the District of Maine:

After agreeing to all substantive settlement terms in the Settlement Agreement (ECF No. 118-1), the Parties negotiated a specific reasonable amount of Plaintiffs' attorneys' fees, costs, and expenses to date through mediation with the Honorable U.S. Magistrate Judge John C. Nivison. As a result of these arms-length, good-faith negotiation efforts, the Parties agree that \$675,000 is a reasonable amount for Plaintiffs' attorneys' fees, costs, and expenses through the date of final approval of this agreement by the Court, subject to the Court's approval under Federal Rule of Civil Procedure 23(h). Defendants shall make payment of \$675,000 in the manner agreed to by the Parties within sixty (60) days of the Court's order issuing final approval of the Settlement Agreement (ECF No. 118-1).


SEEN AND AGREED TO THIS 3rd DAY OF April 2024:

FOR PLAINTIFFS




CHILDREN'S RIGHTS

Marissa C. Nardi (admitted *pro hac vice*)
Samantha Bartosz (admitted *pro hac vice*)
Stephen Dixon (admitted *pro hac vice*)
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FOR THE DEFENDANTS


Jeanne M. Lambrew
Commissioner
Department of Health and Human Services