Settlement Agreement

The undersigned, each of whom are parties to a lawsuit captioned *Maletski, Lopez, Zick, Obama for America, and Democratic National Committee vs. Macomb County Republican Party, Michigan Republican Party, Republican National Committee, and John Does 1-100*, presently pending in the United States District Court for the Eastern District of Michigan as Case No. 2:08-cv-13982-DML-MKM (the "Lawsuit"), wishing to resolve their disputes on a consensual basis, hereby REPRESENT AND AGREE AS FOLLOWS:

1. The undersigned counsel for each party to this Settlement Agreement is fully authorized to enter into this Settlement Agreement on behalf of their respective clients.

2. The Parties agree jointly to issue the following statement:

> "Obama for America, the Democratic National Committee and individual Macomb County residents have alleged that the Republican National Committee, the Michigan Republican Party and the Macomb County Republican Party were planning to use foreclosure lists to challenge certain voters on Election Day. The Republicans have denied the allegations and have stated that they never intended to challenge voters based on any such list. To clarify the matter for all voters, all parties are pleased that they agree that the existence of a person's address on a foreclosure list does not provide a reasonable basis for challenging the person's eligibility to vote and that none of these parties will challenge any voter's eligibility on that basis.
>
> Obama for America
>
> Republican National Committee
>
> Democratic National Committee
>
> Michigan Republican Party
>
> Michigan Democratic Party
>
> Macomb County Republican Party
>
> Macomb County Democratic Party
>
> Duane Maletski, Sharon Lopez and Frances M. Zick."

3. The Parties hereby agree to dismiss the Lawsuit with prejudice, with each Party to bear its own costs and fees, and to immediately execute a stipulation so providing.

AGREED TO AS FOLLOWS:

JAMES R. BRUINSMA (P48531)
Attorney for Individual Plaintiffs
Maletski, Lopez, and Zick

Dated: 10/20/2008

Mary Ellen Gurewitz (P25724
Attorney for Obama for America and
Democratic National Committee

Dated: 10/20/08

Gary P. Gordon (P26290)
Attorney for the Republican National Committee

Dated: 10-20-08

Eric E. Doster (P41482)
Attorney for the Michigan Republican Party

Dated: 10-20-08

John D. Pirich (P23204)
Attorney for Macomb County Republican Party

Dated: 10.20.08

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IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF MICHIGAN

DUANE MALETSKI,
SHARON LOPEZ,
FRANCES M. ZICK,
and all others similarly situated,
OBAMA FOR AMERICA, and
DEMOCRATIC NATIONAL COMMITTEE,

Plaintiffs,

v.

MACOMB COUNTY REPUBLICAN PARTY,
MICHIGAN REPUBLICAN PARTY,
REPUBLICAN NATIONAL COMMITTEE,
and JOHN DOES #1-100,

Defendants.

Case No. 2:08-cv-13982-DML-MKM

Honorable David M. Lawson
District Judge

Honorable Mona K. Majzoub
Magistrate Judge

FILED
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DETROIT

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STIPULATION TO DISMISSAL WITH PREJUDICE AND WITHOUT COSTS

The parties, through their undersigned counsel, hereby stipulate to the dismissal of this lawsuit with prejudice and without costs to any party.

JAMES R. BRUINSMA (P48531)
Attorney for Individual Plaintiffs
Maletski, Lopez, and Zick

Dated: 10/20/2008

Mary Ellen Gurewitz (P25724
Attorney for Obama for America and
Democratic National Committee

Dated: 10/20/08

Gary P. Gordon (P26290)
Attorney for the Republican National Committee

Dated: 10-20-08

John D. Pirich (P23204)
Attorney for Macomb County Republican Party

Dated: 10.20.08

Eric E. Doster (P41482)
Attorney for the Michigan Republican Party

Dated: 10-20-08

DYKEMA GOSSETT A PROFESSIONAL LIMITED LIABILITY COMPANY CAPITOL VIEW 201 TOWNSEND STREET SUITE 900 LANSING MICHIGAN 48933

FOR IMMEDIATE RELEASE
October 20, 2008

Joint Statement from all Parties **in *Maletski et al. vs. Macomb County Republican Party et al.* Regarding Announced Settlement**

Detroit, MI—All plaintiffs and defendants in Maletski, Lopez, Zick, Obama for America, and Democratic National Committee vs. Macomb County Republican Party, Michigan Republican Party, Republican National Committee, and John Does 1-100, released the following statement today.

> **"Obama for America, the Democratic National Committee and individual Macomb County residents have alleged that the Republican National Committee, the Michigan Republican Party and the Macomb County Republican Party were planning to use foreclosure lists to challenge certain voters on Election Day. The Republicans have denied the allegations and have stated that they never intended to challenge voters based on any such list. To clarify the matter for all voters, all parties are pleased that they agree that the existence of a person's address on a foreclosure list does not provide a reasonable basis for challenging the person's eligibility to vote and that none of these parties will challenge any voter's eligibility on that basis."**

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Michigan Democratic Party
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Macomb County Democratic Party
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Republican National Committee
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Macomb County Republican Party
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Duane Maletski, Sharon Lopez and Frances M. Zick
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