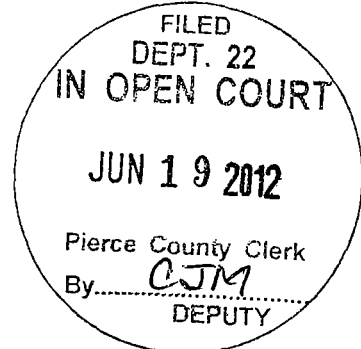


The Honorable John R. Hickman



SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

KEVIN DOLAN and a class of similarly situated individuals, Plaintiffs, v. KING COUNTY, a political subdivision of the State of Washington, Defendant.

NO. 06-2-04611-6

STIPULATION AND ORDER

STIPULATION

In its class certification made of September 15, 2006, the Court reserved ruling on whether the class should include the following individuals:

All W-2 employees of the King County public defender agencies and any former or predecessor King County public defender agencies who have not worked for one of the King County public defender agencies within three years of the filing of this lawsuit but who work or have worked in a PERS-eligible position within three years of the filing of this lawsuit.

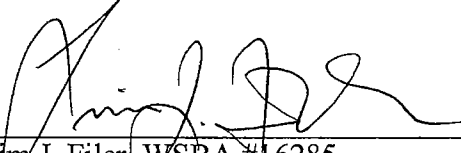
The parties now agree that those individuals (the Additional Class Members) should be included in the class. The parties agree that this stipulation is made without prejudice to any of King County's contentions regarding or defenses to the claims of the Additional Class Members, whether individually or as a groups, including, without limitation, King County's

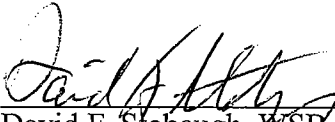
1 statute of limitations defense. All such contentions and defenses are reserved for future  
2 resolution.

3 DATED this 19th day of June, 2012.

4 FOSTER PEPPER PLLC

BENDICH, STOBAUGH & STRONG, P.C.

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6   
7 Tim J. Filer, WSBA #16285  
8 P. Stephen DiJulio, WSBA #7139  
9 Kathryn Carder McCoy, WSBA No. 38210  
Attorneys for King County

5  
6   
7 David F. Stobaugh, WSBA #6376  
8 Lynn S. Prunhuber, WSBA #10704  
9 Stephen K. Strong, WSBA #6299  
Attorneys for Plaintiff and the Class

10 **ORDER**

11  
12 It is so ordered. The class is now defined as:

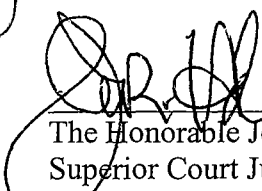
13 All W-2 employees of the King County public defender agencies and any  
14 former or predecessor King County public defender agencies who work or  
15 have worked for one of the King County public defender agencies within  
16 three years of the filing of this lawsuit.

17 and


18 All W-2 employees of the King County public defender agencies and any  
19 former or predecessor King County public defender agencies who have not  
20 worked for one of the King County public defender agencies within three  
21 years of the filing of this lawsuit but who work or have worked in a PERS-  
22 eligible position within three years of the filing of this lawsuit.

23 This order is without prejudice to any of King County's contentions regarding or  
24 defenses to the claims of the Additional Class Members, whether individually or as a groups,  
25 including, without limitation, King County's statute of limitations defense, all of which are  
26 reserved for future resolution without deciding whether there are any such defenses.  
27

1 DATED this 19 day of June, 2012.


2  
3  
4   
The Honorable John R. Hickman  
Superior Court Judge

5 Stipulation Approved, Order Presented By:  
6 BENDICH, STOBAUGH & STRONG, P.C.

7   
8 David F. Stobaugh, WSBA #6376  
9 Lynn S. Prunhuber, WSBA #10704  
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11 *Attorneys for Plaintiff & the Class*

FILED  
DEPT. 22  
IN OPEN COURT  
  
JUN 19 2012  
  
Pierce County Clerk  
By..... CJM .....  
DEPUTY

12 Stipulation Approved; Order Approved For Entry:

13 FOSTER PEPPER PLLC  
14   
15  
16 Tim J. Filer, WSBA #16285  
17 P. Stephen DiJulio, WSBA #7139  
Kathryn Carder McCoy, WSBA No. 38210  
*Attorneys for King County*