

**Exhibit B**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

YORK DAILY RECORD,	:	Case No. 1:22-cv-361-SHR
THE YORK DISPATCH,	:	(Hon. Sylvia H. Rambo)
THE PHILADELPHIA INQUIRER	:	
d/b/a SPOTLIGHT PA,	:	
LNP MEDIA GROUP, INC., and	:	
WITF,	:	<i>Electronically filed</i>
Plaintiffs,	:	
	:	
	:	
v.	:	
	:	
	:	
DANIEL J. BYRNES, in his official	:	
capacity as Clerk of Court for	:	
York County, Pennsylvania,	:	
Defendant.	:	

**JOINT STIPULATION OF VOLUNTARY DISMISSAL**

IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action, in consideration of a negotiated settlement agreement executed by them, that all of Plaintiffs' claims against Defendant in the above-captioned matter shall be dismissed without prejudice pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, conditioned on the Court's entry of an order dismissing those claims and retaining jurisdiction over the dismissed claims for sixty days to enforce the Settlement Agreement.

Respectfully submitted,

Date: \_\_\_\_\_, 2022

Date: \_\_\_\_\_, 2022

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WITF, : *Electronically filed*  
Plaintiffs, :  
 :  
 :  
v. :  
 :  
 :  
DANIEL J. BYRNES, in his official :  
capacity as Clerk of Court for :  
York County, Pennsylvania, :  
Defendant. :

**[PROPOSED] ORDER OF DISMISSAL**

Upon consideration of the parties' joint stipulation of voluntary dismissal, it is HEREBY ORDERED that all of Plaintiffs' claims against Defendant in the above-captioned are DISMISSED without prejudice.

The Court shall retain jurisdiction over the dismissed claims for sixty days solely for the purpose of enforcing the parties' Settlement Agreement.

Dated: \_\_\_\_\_, 2022

\_\_\_\_\_  
Hon. Sylvia H. Rambo  
United States District Judge