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, : Electronically filed

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: Nov. 10, , 2022

Paula Knudsen Burke

REPORTERS COMMITTEE FOR

FREEDOM OF THE PRESS

1156 15th St. NW

Suite 1020

Washington, DC 20005

(717) 370-6884

pknudsen@rcfp.org

Stephen R. McDonald CGA LAW FIRM 135 N. George Street

York, PA 17401 (717) 848-4900

smcdonald@cgalaw.com

Counsel for Defendant

Date: NOV- 8th, 2022

Sasha Dudding

REPORTERS COMMITTEE FOR

FREEDOM OF THE PRESS

1156 15th St. NW

Suite 1020

Washington, DC 20005

(202) 800-3538 x132

sdudding@rcfp.org

Counsel for Plaintiffs

Approved: November 16, 2022

S/Sylvia H. Rambo

United States District Judge

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, : 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 |