

SETTLEMENT AGREEMENT AND RELEASE

Petitioner John Becker and Respondent the University of Tennessee ("UT"), by and through their undersigned counsel, enter into this Settlement Agreement and Release (the "Agreement") as follows:

1. UT will pay a total of \$60,000.00 in full and complete satisfaction of any claim by Mr. Becker and/or his counsel for attorneys' fees, costs, and litigation expenses under the Tennessee Public Records Act ("TPRA") in the case of *Becker v. University of Tennessee*, Case No. 208439-1 (6th Judicial District).

2. UT will pay the above amount by check made out to "Reporters Committee for Freedom of the Press" and mail it to 1156 15th St. NW, Suite 1020, Washington, DC 20005. After the parties' execution of this agreement, UT will remit the check as set forth above within fifteen business days of the approval of the Agreement by all necessary officers of the University and the State of Tennessee.

3. UT affirms that it has already provided Mr. Becker with copies of all the records sought in Case No. 208439-1 except unredacted versions of the two operating agreements at issue in the case. UT will provide Mr. Becker, through his counsel, with copies of the unredacted operating agreements at issue in this case within two business days of the approval of the Agreement by all necessary officers of the University and the State of Tennessee.

4. Upon completion of the requirements of paragraphs 1 through 3 of this Agreement, Mr. Becker releases and forever discharges UT from any and all past, present, or future claims for any relief under the Tennessee Public Records Act for

the records sought as set out in the Petition, including attorneys' fees, costs, or litigation expenses in connection with Case No. 208439-1. This release does not apply to any other litigation.

5. Upon completion of the requirements of paragraphs 1 through 3 of this Agreement, the parties will seek the dismissal of Case No. 208439-1 with prejudice under Tennessee Rule of Civil Procedure 41.01 by filing the attached Notice of Voluntary Dismissal and Agreed Order of Voluntary Dismissal.

6. The parties acknowledge that this Agreement is entered into solely for the purpose of settling and compromising the claims in this action without further litigation, and it will not be construed as evidence or as an admission regarding any issues of law or fact, or regarding the truth or validity of any allegation or claim raised in this action, or as evidence or as an admission by UT regarding Mr. Becker's entitlement to or eligibility for attorneys' fees and other litigation costs under the TPRA.


7. This Agreement may be executed in counterparts on the parties' behalf by their attorneys of record and is effective on the date upon which both parties have executed this Agreement. Facsimiles and pdf versions of signatures will constitute acceptable, binding signatures for purposes of this Agreement.

SO STIPULATED AND AGREED this 17th day of June, 2024.

[SIGNATURES FOLLOW ON NEXT PAGE]

READ THIS ENTIRE SETTLEMENT AGREEMENT AND RELEASE CAREFULLY
AND CONSIDER ALL OF ITS PROVISIONS BEFORE SIGNING IT. IT INCLUDES
A RELEASE OF KNOWN AND UNKNOWN CLAIMS.


JOHN BECKER



John Becker, Petitioner

Date: 6/17/2024

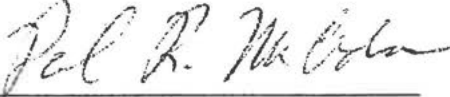
THE UNIVERSITY OF TENNESSEE

By: 

David L. Miller
Senior Vice President & Chief
Financial Officer

Date: 1/23/2025 | 11:00:07 PST

PAUL R. MCADOO, ESQ.



Paul R. McAdoo, Esq.
Counsel for Petitioner

Date: 6/17/24

EXHIBIT A

IN THE CHANCERY COURT OF KNOX COUNTY, TENNESSEE
FOR THE SIXTH JUDICIAL DISTRICT AT KNOXVILLE

JOHN BECKER,

Petitioner,

v.

THE UNIVERSITY OF TENNESSEE,

Respondent.

No. 208439-1

NOTICE OF VOLUNTARY DISMISSAL

Pursuant to Tennessee Rule of Civil Procedure 41.01 and the agreement between the parties, Petitioner John Becker hereby dismisses this action with prejudice, with each party to bear their own court costs.

Respectfully submitted this ____ day of June, 2024.

/s/ Paul R. McAdoo
Paul R. McAdoo (BPR No. 034066)
THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS
6688 Nolensville Rd., Suite 108-20
Brentwood, TN 37027
Phone: 615.823.3633
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Gunita Singh, *pro hac vice*
REPORTERS COMMITTEE FOR
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1156 15th St. NW, Suite 1020
Washington, D.C. 20005
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Facsimile: 202.795.9310
gisngh@rcfp.org

Counsel for Petitioner

CERTIFICATE OF SERVICE

The undersigned certifies that on June ____, 2024, a true and correct copy of the foregoing was served by email, as agreed by the parties, on:

T. Harold Pinkley, BPR No. 009830
University of Tennessee
505 Summer Place – UT Tower 1109
Knoxville, TN 37902
Tel. (865) 974-3416
harold.pinkley@tennessee.edu

/s/ Paul R. McAdoo
Counsel for Petitioner

IN THE CHANCERY COURT OF KNOX COUNTY, TENNESSEE
FOR THE SIXTH JUDICIAL DISTRICT AT KNOXVILLE

JOHN BECKER,

Petitioner,

v.

THE UNIVERSITY OF TENNESSEE,

Respondent.

No. 208439-1
NOTICE OF ENTRY
REQUESTED

AGREED ORDER OF VOLUNTARY DISMISSAL

This matter comes before the Court on Petitioner's Notice of Voluntary Dismissal, pursuant to Tennessee Rule of Civil Procedure 41.01 and the agreement between the parties. In accordance with Tenn R. Civ. P. 41.01(3), this action is hereby dismissed with prejudice with each party to bear their own court costs.

ENTERED this ____ day of _____, 2024.

CHANCELLOR WEAVER

Date

APPROVED FOR ENTRY:

/s/ Paul R. McAdoo
Paul R. McAdoo, BPR No. 34066
Gunita Singh, *pro hac vice*
Reporters Committee for Freedom of the Press
6688 Nolensville Rd., Ste. 108-20
Brentwood, TN 37027
Tel: (615) 823-3633
pmcadoo@rcfp.org
gsingh@rcfp.org

/s/ T. Harold Pinkley (with permission)
T. Harold Pinkley, BPR No. 009830
University of Tennessee
505 Summer Place – UT Tower 1109
Knoxville, TN 37902
Tel. (865) 974-3416
harold.pinkley@tennessee.edu

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Tel. (865) 974-3416
harold.pinkley@tennessee.edu

Counsel for Respondent University of Tennessee

/s/ Paul R. McAdoo
Counsel for Petitioner