

## 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:

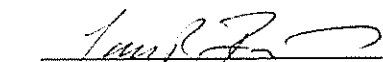
1. The undersigned counsel for each party to this Settlement Agreement is fully authorized to enter into this Settlement Agreement on behalf of their respective clients.
2. The Parties agree jointly to issue the following statement:

"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.

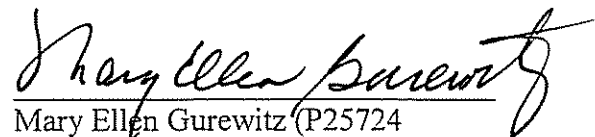
Obama for America  
Republican National Committee  
Democratic National Committee  
Michigan Republican Party  
Michigan Democratic Party  
Macomb County Republican Party  
Macomb County Democratic Party  
Duane Maletski, Sharon Lopez and Frances M. Zick."

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.

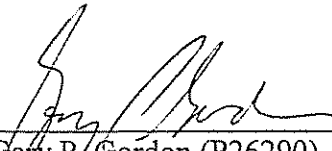
AGREED TO AS FOLLOWS:

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

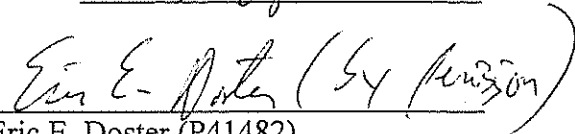
Dated: 10/20/08

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

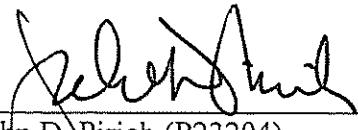
Dated: 10/20/08

  
\_\_\_\_\_  
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

3

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,

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

Honorable David M. Lawson  
District Judge

Plaintiffs,

Honorable Mona K. Majzoub  
Magistrate Judge

v.

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

FILED  
OCT 20 2008  
CLERK'S OFFICE  
DETROIT

Defendants.

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DYKEMA GOSSETT A PROFESSIONAL LIMITED LIABILITY COMPANY, CAPTOL VIEW 301 TOWNSEND STREET SUITE 900 LANSING MICHIGAN 48933

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Committee  
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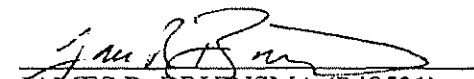
JOHN D. PIRICH (P23204)  
ANDREA L. HANSEN (P47358)  
Attorneys for Macomb County Republican  
Party  
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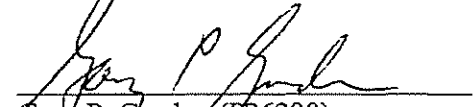
**STIPULATION TO DISMISSAL WITH PREJUDICE AND WITHOUT COSTS**

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

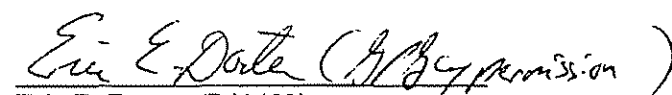
DYKEMA GOSSETT A PROFESSIONAL LIMITED LIABILITY COMPANY, CAPITOL VIEW 201 TOWNSEND STREET SUITE 900 LANSING MICHIGAN 48201

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


Dated: 10/20/2008

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

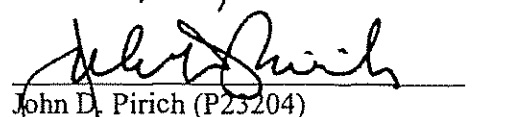
Dated: 10-20-08

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

Dated: 10-20-08

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

Dated: 10/20/08

  
John D. Pirich (P25204)  
Attorney for Macomb County Republican  
Party

Dated: 10.20.08

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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Contact:

Obama for America

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Phone: (313)316-3902

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Contact: Danny Diaz  
Phone: (202)863-8600

Democratic National Committee

Contact: Luis Miranda  
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Michigan Democratic Party

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Macomb County Republican Party

Contact: Bill Nowling  
Phone: (517)487-5413

Macomb County Democratic Party

Contact: Elizabeth Kerr  
Phone: (858)775-7986

Duane Maletski, Sharon Lopez and Frances M. Zick

Contact: Jim Bruinsma  
Phone: (616)233-9640