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July 31, 2015

VIA ELECTRONIC FILING

Honorable Mark Falk, U.S.M.J.
United States District Court for the
District of New Jersey
Frank R. Lautenberg U.S. P.O. & Courthouse
1 Federal Square, Room 457
Newark, New Jersey 07102

Re: Woi Cheng Lim, et al. v. Sandra Massaro, et al.
Civil Action No.: 2:13-cv-07399-CCC-MF
Our File No.: 105

Dear Judge Falk:

This office represents Defendants, Sandra Massaro, Lynn Trager, and the Tenaflly Board of Education (hereinafter referred to as the "Board") (hereinafter collectively referred to as the "School Defendants"), in connection with the above captioned matter. In anticipation of the conference scheduled before Your Honor on August 7, 2015, kindly accept this correspondence as a brief overview of the terms of the settlement between Plaintiffs and the School Defendants.

As Your Honor is aware, this litigation is the result of a finding of harassment, intimidation, and bullying (hereinafter referred to as "HIB"), pursuant to the New Jersey Anti-Bullying Bill of Rights Act and the policies of the Tenaflly Board of Education Policy. Pursuant to an Order issued by the Honorable Claire C. Cecchi, U.S.D.J., the parties participated in mediation, which ultimately resulted in an agreement being reached between Plaintiffs and the School Defendants. As such, the pertinent terms

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of the settlement provide that, in exchange for withdrawing the Complaint, with prejudice, as to the School Defendants: (1) Plaintiffs shall receive a lump sum payment of Twenty-One Thousand Six Hundred Dollars (\$21,600) toward the cost of legal fees incurred; (2) any document relating to the HIB decision or the subject matter of this litigation shall be removed from their child's student records; and (3) because of the nature of the HIB incident and the passage of time since that incident, the Board will not use its findings and decision as a platform for progressive discipline.

If Your Honor has any questions or require further information, of course, please feel free to contact me. Thank you for Your Honor's time and consideration.

Respectfully submitted,

FOGARTY & HARA, ESQS.

BY: /s/ Stephen R. Fogarty
STEPHEN R. FOGARTY

SRF:dh

cc: F. Michael Daily, Jr., Esq., via Electronic Filing
Jennifer McGruther, Esq., via Electronic Filing
Ms. Lynn Trager, Superintendent of Schools, via E-mail only
Mr. Yas Usami, Business Administrator/Board Secretary, via E-mail only