

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

FILED NOV 28 1988

PLEDGE OF RESISTANCE, et al. : CIVIL ACTION  
Plaintiffs :  
v. :  
WE THE PEOPLE 200, INC., et al. :  
Defendants : No. 87-3975

SETTLEMENT AGREEMENT

Plaintiffs and the Federal and City Defendants,  
by their undersigned counsel, hereby agree to settle and  
fully resolve all the claims in the above matter on the  
following terms:

1. The preliminary injunction issued by the  
Court on July 10, 1987 shall, with the Court's approval,  
be made permanent and entered by the Court as a permanent  
Order which is attached as Exhibit "A".

2. The surveillance claims raised in the  
Complaint are now viewed by the parties as moot since none  
of the Plaintiff groups or individuals are or have been  
since the institution of this action under any surveillance  
involving the City or the Police Department.

3. City Defendants acknowledge that despite  
some comments attributed to them and widely publicized,  
Plaintiff groups engage in public debate on major issues  
of the day and as such pose no danger to the public.

ENTERED: 11/29/88

CLERK OF COURT

4. Federal and City Defendants will pay the following amounts in full settlement of all attorneys' fees, costs and damages arising under this action:

**Fifteen Thousand Dollars (\$15,000)** to be paid by Federal Defendant as attorneys' fees under the Equal Access To Justice Act;

**Sixteen Thousand Dollars (\$16,000)** to be paid by Federal Defendants under the Federal Tort Claims Act. This amount will be paid to Plaintiffs initially by the City, which shall be reimbursed for the full amount of such claim by Federal Defendants under the Federal Tort Claims Act;

**One Thousand Five Hundred Dollars (\$1,500)** by Federal Defendants as costs;

**Forty-Two Thousand Five Hundred Dollars (\$42,500)** by City Defendants as damages, attorneys' fees and costs.

5. This Agreement does not constitute an admission by any Defendants of any violation of the Constitution or statutes of the United States or the Commonwealth of Pennsylvania.

6. This Agreement is contingent on the approval