

## MUTUALLY AGREED-UPON STATEMENT

October 17, 2013—PA Child Care, LLC; Western PA Child Care, LLC; and Mid-Atlantic Youth Services Corp., owners and operators of juvenile detention centers in Pittston, Luzerne County, and Emlenton, Butler County (also identified in this litigation as the Provider Defendants) have agreed to settle claims brought by juveniles who appeared before former Luzerne County Juvenile Court Judge Mark A. Ciavarella Jr., as well as parents of those juveniles (who were not fully reimbursed in a prior settlement with other defendants earlier in this civil lawsuit), for \$2,500,000. By settling these claims, the Provider Defendants do not admit to any wrongdoing, liability, or breach of duty.

The juveniles and parents who participate in this settlement acknowledge that the Provider Parties have never been accused of failing to provide services that they were contracted to provide to any juvenile included in the juvenile settlement class. They also acknowledge, by settling their claims, that any claims regarding the juveniles' care and treatment while detained in or placed at PA Child Care's facility in Pittston, Luzerne County, or Western PA Child Care's facility in Emlenton, Butler County are withdrawn.

The proposed settlement will be filed with the Court and must be approved before its terms are final. If the Court approves the settlement, the Provider Defendants will be released from any further liability to the settling parties. The civil lawsuit will continue against the former Luzerne County judges Ciavarella and Michael T. Conahan, as well as against Robert Powell and his company Vision Holdings.