

HARDY MYERS
Attorney General
KATHERINE G. GEORGES #84231
Assistant Attorney General
Department of Justice
1162 Court Street NE
Salem, OR 97301-4096
Telephone: (503) 378-6313
Fax: (503) 378-3465
Email: kate.georges@state.or.us

Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

KENNEDY-WESTERN UNIVERSITY, CLIF
BENNETT, GLORIA BRACY, and JAMES
CORNISH,

Plaintiffs,

v.

ALAN CONTRERAS, Administrator of the
Oregon Student Assistance Commission
Office of Degree Authorization, and HARDY
MYERS, Attorney General for the State of
Oregon,

Defendants.

Case No. 04-CV-1023-HU

SETTLEMENT AGREEMENT ADDENDUM

This Settlement Agreement Addendum (hereinafter, "Addendum") is made between Hardy Myers, in his official capacity as Attorney General of the State of Oregon; Alan Contreras, in his official capacity as Administrator of the Office of Degree Authorization of the Oregon Student Assistance Commission; and the Oregon Student Assistance Commission

(collectively "Defendants") and Kennedy-Western University, Clif Bennett, Gloria Bracy, and James Cornish (collectively "Plaintiffs").

16. This Addendum addresses the Senate hearings held before the Senate Committee on Government Affairs on May 11-12, 2004, entitled "Are Taxpayer Dollars Subsidizing Diploma Mills" ("Senate hearings"). Defendants shall permanently delete the link to the Senate hearings that is located next to the name of Kennedy-Western University on ODA's website list of Unaccredited Colleges. This Addendum does not require the defendants to delete the web address or links for the Senate hearings that appear as general public information links in other locations on ODA's website.

KENNEDY-WESTERN UNIVERSITY

DATED: _____, 2004

By: _____
Paul Saltman, President

DATED: _____, 2004

CLIF BENNETT

DATED: _____, 2004

GLORIA BRACY

DATED: _____, 2004

JAMES CORNISH

DATED: _____, 2004

ALAN CONTRERAS
Administrator
Office of Degree Authorization
Oregon Student Assistance Commission

DATED: _____, 2004

SHELLEY TURNER
Executive Director
Oregon Student Assistance Commission

DATED: _____, 2004

HARDY MYERS
Attorney General, State of Oregon

REVIEWED AND APPROVED AS TO FORM:

DATED: _____, 2004.

STOLL STOLL BERNE LOKTING &
SHLACHTER

DATED: _____, 2004.

OREGON DEPARTMENT OF JUSTICE

ROBERT A. SHLACHTER
Attorney for Plaintiffs

KATHERINE G. GEORGES
Assistant Attorney General
Attorney for Defendants