

Northern California River Watch vs. Benjamin Shimak
Case C 07 0210 PJH

SETTLEMENT AGREEMENT

This action is settled for the sum of \$10,000 to PJ and \$2500 to charity payable within 30 days.

Plaintiff and Defendant shall each execute a Mutual Release of any and all claims.

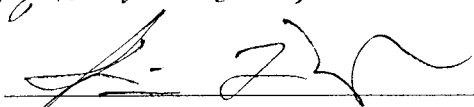
Plaintiff and Defendant agree to a waiver of all rights under Section 1542 of the Civil Code of the State of California. Plaintiff and Defendant shall execute a Dismissal with prejudice, each party to bear his/her own fees and costs.

Settlement drafts are to be made payable to Plaintiff, Northern California River Watch. Closing papers are to be prepared and executed within the next 30 days. Any dispute regarding the terms and provisions of closing documents and issues regarding timing of full payment shall be resolved by William L. Nagle. Settlement drafts shall be transmitted to Plaintiff's counsel within the next 60 days.

This is a settlement agreement following the mediation. For purposes of settlement, it is not subject to Evidence Code §1119 et seq. This contract is admissible, binding and enforceable pursuant to CCP §664.6 and Evidence Code §1123 (effective January 1, 1998).

* Charity to be determined by Plaintiff subject to approval by release.

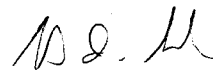
DATED: June 19, 2007


William L. Nagle, Mediator

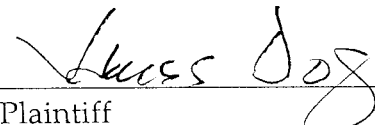
DATED: 6-19-2007


Attorney for Plaintiff

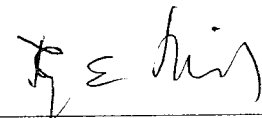
DATED: 6-19-2007


Attorney for Defendant

DATED: 6-19-2007


Plaintiff

DATED: 6-19-2007


Defendant