

## **SETTLEMENT AGREEMENT AND RELEASE**

Plaintiffs Star News Digital Media, Inc., Michael Patrick Leahy, and Matthew D. Kittle (“Plaintiffs”) and Defendant U.S. Federal Bureau of Investigation (“FBI”), by and through their undersigned counsel, enter into this Settlement Agreement and Release (the “Agreement”) as follows:

1. Treasury will pay Plaintiffs eighty-six thousand and two hundred dollars (\$86,200.00), in full and complete satisfaction of any claim by Plaintiffs for attorneys’ fees, costs, and litigation expenses under the Freedom of Information Act (“FOIA”) in connection with the case of *Star News Digital Media, Inc. v. Federal Bureau of Investigation*, No. 3:23-cv-476-AAT (M.D. Tenn.) (the “Action”). These payments will constitute full and final satisfaction of any and all of Plaintiffs’ claims for attorneys’ fees, costs, and litigation expenses in connection with the Action, and is inclusive of any interest.

2. Defendant FBI will pay the above amount by wire transfer to an account at a financial institution designated in writing by counsel for Plaintiffs, consistent with normal processing procedures. Plaintiffs’ counsel will provide Defendant’s counsel the bank routing and account information for the account to receive such payment.

3. Upon execution of this Agreement, Plaintiffs release and forever discharge Defendant FBI and its successors, the United States of America, and any department, agency, or establishment of the United States, and any officers, employees, agents, successors, or assigns of such department, agency, or establishment, from any and all past, present, or future claims for attorneys’ fees, costs, or litigation expenses in connection with the Action.

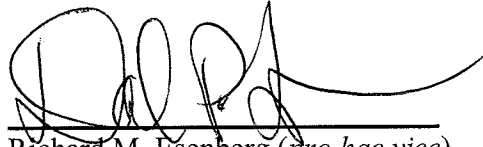
4. Concurrent with the execution of this Agreement, the parties will seek the dismissal of the Action with prejudice under Federal Rule of Civil Procedure 41(a) by filing the

attached Stipulation of Dismissal with prejudice. Defendant FBI's obligation to make the payments specified in Paragraph 1 of this Agreement is contingent on filing of the attached Stipulation of Dismissal with Prejudice.

5. The parties acknowledge that this Agreement is entered into solely for the purpose of settling and compromising any remaining claims in this action without further litigation, and it will not be construed as evidence or as an admission regarding any issue of law or fact, or regarding the truth or validity of any allegation or claim raised in this action, or as evidence or as an admission by Defendant FBI regarding Plaintiffs' entitlement to or eligibility for attorneys' fees, costs, or other litigation expenses. This Agreement shall not be used in any manner to establish liability for fees, amounts, or hourly rates in any other case or proceeding. This Agreement may not be used as evidence or otherwise in any civil or administrative action or proceeding against Defendant FBI or the United States or any of their present or former officials, employees or agents, either in their official or individual capacities, except for proceedings necessary to implement or enforce the terms hereof.

6. This Agreement may be executed in counterparts on the parties' behalf by their attorneys of record, and is effective on the date by which both parties have executed this Agreement. PDF versions of signatures will constitute acceptable, binding signatures for purposes of this Agreement.

SO STIPULATED AND AGREED this 5th day of June, 2025.



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## **Exhibit A**

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

STAR NEWS DIGITAL MEDIA, INC.,  
MICHAEL PATRICK LEAHY, and  
MATTHEW D. KITTLE,

*Plaintiffs,*

v.

FEDERAL BUREAU OF  
INVESTIGATION,

*Defendant.*

Civil Action No. 3:23-cv-00467-AAT

**STIPULATION OF DISMISSAL WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and the terms of the parties' Settlement Agreement on June 5, 2025, the parties, by and through their undersigned counsel, hereby stipulate to the dismissal of this action with prejudice.

Dated: June 5, 2025

Respectfully submitted,

WISCONSIN INSTITUTE FOR LAW &  
LIBERTY, INC.

/s/ Daniel P. Lennington

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