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Carol J. Garvan, Esq. ACLU P.O. Box 7860 Portland, ME 04112-760

RE: Human Rights Defense Center v. MCCA Self-Funded Risk Management Pool - Docket No. CV-21-131

Dear Carol:

Following up on our recent discussion regarding compliance with the Order of Justice Billings, this is to confirm that the \$30,000 payment to Jonathan Afanador and his attorneys was the only payment made by the Risk Pool in settlement of the civil rights claim asserted by Jonathan Afanador against Kennebec County. There was no separate payment made to anyone else, including the attorneys representing Jonathan Afanador.

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JTE/ml Enclosure cc: Zachary L. Heiden, Esq.