

Exhibit “A”

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

**OLD TOWN TROLLEY TOURS OF)
SAVANNAH, INC.)**

Plaintiff,)

CIVIL ACTION NO. SPCV20-00767-MO

v.)

**MAYOR AND ALDERMEN OF THE)
CITY OF SAVANNAH)**

Defendants.)

[PROPOSED] CONSENT JUDGMENT ON AGGREGATE REFUND AND ORDER

Plaintiff Old Town Trolley Tours of Savannah, Inc. (“Named Plaintiff) having filed the instant class action lawsuit (the “Lawsuit”) pursuant to O.C.G.A. § 48-5-380 against the Mayor and Aldermen of the City of Savannah (“Defendant” or the “City of Savannah”) on behalf of itself and all taxpayers similarly situated seeking refunds for preservation fees collected under City of Savannah Revenue Ordinance Article T.§3 (the “Preservation Fee” and the “Preservation Fee Ordinance”) from 2015 to 2020 and the Parties stipulating to the amount of the aggregate refund fund;

THEREFORE, IT IS ORDERED as follows:

A. Class Certification

Named Plaintiff and Defendant hereby stipulate to the certification of one (1) class and two subclasses pursuant to O.C.G.A. § 9-11-23(b)(1) and the Court finds that such certification is appropriate. The class consists of taxpayers similarly situated who, like Named Plaintiff, paid the Preservation Fee under Revenue Ordinance Article T.§3. The class is defined as follows:

Taxpayers similarly situated who, like Named Plaintiff, paid the Preservation Fee under Revenue Ordinance Article T, §3 from August 28, 2015 through 2020 (hereinafter the “Class”);

The Class is comprised of two (2) subclasses defined as follows:

(1) Taxpayers who operated sightseeing tours within the Historic District of Savannah and paid the Preservation Fee under Revenue Ordinance Article T, §3 (“Tour Operators”) from August 28, 2015 through 2020 (the “Tour Operator Subclass”).

(2) Participants in sightseeing tours within the Historic District of Savannah who were charged for the Preservation Fee under Revenue Ordinance Article T, § 3 by tour operators and paid the Preservation Fee (“Tour Participants”) from August 28, 2015 through 2020 (the “Tour Participant Subclass”).

“Class Member” or “Class Members” means a member or members of the Class. The Court specifically finds that class certification is appropriate because:

- 1) The potential Class Members are so numerous that joinder of all members is impractical, satisfying the requirements of O.C.G.A. § 9-11-23(a)(1);
- 2) There are questions of law or fact common to each Class Member, satisfying the requirements of O.C.G.A. § 9-11-23(a)(2);
- 3) The claims of the representative parties are typical of the claims of Class Members, satisfying the requirements of O.C.G.A. § 9-11-23(a)(3);
- 4) Named Plaintiff will fairly and adequately protect the interests of the Class Members, satisfying the requirements of O.C.G.A. § 9-11-23(a)(4);
- 5) Certification of the Classes is appropriate under O.C.G.A. § 9-11-23(b)(1) as the prosecution of separate actions by or against individual class members would create

a risk of inconsistent or varying adjudications with respect to individual class members which would establish incompatible standards of conduct for the party opposing the class or adjudications with respect to individual Class Members which would as a practical matter be dispositive of the interests of the other members not parties to the adjudications or substantially impair or impede their ability to protect their interests;¹

- 6) The law firms of Roberts Tate, LLC and Manly Shipley, LLP will fairly and adequately represent the interests of the Classes as Class Counsel; and
- 7) The action is manageable as a class action.

Named Plaintiff Old Town Trolley Tours of Savannah, Inc. shall serve as class representatives for the Class as defined herein.

The law firms of Roberts Tate, LLC and Manly Shipley, LLP are appointed as Class Counsel for the Class certified herein.

B. Consent Judgment on the Aggregate Refund Amount

Named Plaintiff and Defendant stipulate to an aggregate refund amount of \$2,750,000.00 (hereinafter the “Aggregate Refund Fund”) to be used to pay refunds to the Class for the claims for tax refunds asserted in this action for tax years 2015 through 2020. The Court hereby approves and ENTERS A CONSENT JUDGMENT pursuant to O.C.G.A. § 48-5-380 in favor of Named

¹ Additionally, while the Court has elected to only certify the Class under 9-11-23(b)(1), the Court also finds that certification under 9-11-23(b)(3) would be appropriate as questions of law or fact common to the members of the Class predominate over questions affecting only individual members, satisfying the requirements of O.C.G.A. § 9-11-23(b)(3) and a class action is superior to other methods available for the fair and efficient adjudication of this controversy satisfying the requirements of O.C.G.A. § 9-11-23(b)(3).

Plaintiff in the amount of \$2,750,000.00. Defendant will pay \$2,750,000.00 into the Aggregate Refund Fund as follows:

- (1) \$916,666.67 on or before April 1, 2021;
- (2) \$916,666.67 on or before April 1, 2022;
- (3) \$916,666.66 on or before April 1, 2023.

In the event that Defendant fails to pay any portion of the Aggregate Refund Fund on or before the date set forth above, post judgment interest shall accrue at the rate of 7.0% per annum as set by O.C.G.A. § 7-4-2(a)(1)(A) on said amount until paid in full.

The Aggregate Refund Fund shall be the sole source used to pay: (i) all tax refunds owed to Named Plaintiff and Class Members as set forth herein (the “Class Refunds”); (ii) prejudgment interest owed to Named Plaintiff and Class Members on the tax refunds owed; (iii) Named Plaintiff’s Counsel for attorneys’ fees and expenses as set forth herein and as approved by the Court; and (iv) the costs of administering the Aggregate Refund Fund including the costs and expenses of the Administrators and the costs of notice to the Class Members as described herein, the costs and expenses of the Special Master, and the direct costs and expenses for the distribution and mailing of the Class Refunds.

The Aggregate Refund Fund shall be paid to a Qualified Settlement Fund under Section 468B of the Internal Revenue Code to be identified and established prior to and to be specified in the Final Order (the “Old Town Trolley QSF”) to carry out the payment of approved Fees and Expenses of Class Counsel set forth in Section E and the Refund Payment Process set forth in Section I herein. The Final Order will appoint Terry D. Turner, Jr. of Gentle Turner Sexton & Harbison, LLC, 501 Riverchase Parkway East, Suite 100, Hoover, Alabama 35244 as administrator of the Old Town Trolley QSF (the “Old Town Trolley QSF Administrator”). The

costs of the Old Town Trolley QSF Administrator shall be paid from the Aggregate Refund Fund. The Aggregate Refund Fund shall be deposited into an interest-bearing bank account (the "Aggregate Refund Fund Account") established by the Old Town Trolley QSF Administrator. The Aggregate Refund Fund Account shall have a unique Taxpayer Identifier Number.

The Old Town Trolley QSF Administrator shall act as a fiduciary with respect to the handling, management and distribution of the Aggregate Refund Fund.

Except as set forth above, the costs of administering the Class Refunds shall not include any costs incurred by Defendant related to the webpage used for notification of Class Members or time devoted by employees of Defendant in fulfilling the terms of this Consent Judgment. The Aggregate Refund Fund shall be the sole and exclusive source for payment of the Class Refunds and fees and expenses by Defendant and upon payment in full of the amount of the Aggregate Refund Fund owed by Defendant shall be in sole satisfaction of all claims against Defendant. Under no circumstances shall Defendant be required to pay an amount greater than the Aggregate Refund Fund amount.

C. Appointment of Administrators

Larry Griggers is appointed Administrator to identify Class Members and members of the Tour Operator Subclass and Tour Participant subclass entitled to refunds based on the City of Savannah's databases, records and resources of the City of Savannah Revenue Department and to calculate the individual refund amounts, if any, due each Class Member as set forth herein. The Administrator will be given full access to the records of the City of Savannah and the City of Savannah Revenue Department. In the event that Larry Griggers cannot serve, substitute Administrator or Administrators consented to by the Parties shall be appointed.

The Administrator's fees will be paid from the Aggregate Refund Fund. The Administrator will be paid the hourly rate of \$150 per hour for his services and \$50 per hour for administrative personnel hired to assist him. Upon completion of the Administrator's work he shall submit an accounting of all charges and expenses to Named Plaintiff's Counsel and Defendant's Counsel at least fifteen (15) days prior to submission of such charges and expenses to the Old Town Trolley QSF Administrator. Named Plaintiff's Counsel and Defendant's Counsel shall notify the Administrator of any objections to his charges and expenses within five (5) days of receipt. The Old Town Trolley QSF Administrator will pay the Administrator's charges and expenses within ten (10) days of submission provided there are no unresolved objections. Any unresolved objections shall be submitted to the Special Master as set forth below for resolution and whose decision shall be binding.

D. Preliminary Approval of Proposed Consent Judgment and Order, Notification of Class and Objection Procedure

Named Plaintiff and Defendant shall promptly move the Court for an Order granting preliminary approval of this [Proposed] Consent Judgment (the "Preliminary Approval Order"). The proposed Preliminary Approval Order that will be attached to the motion and shall be in a form agreed upon by Named Plaintiff's Counsel and Defendant's Counsel. The Motion for Preliminary Approval shall request that the Court: (i) approve the [Proposed] Consent Judgment as set forth herein as being within the range of fair, adequate and reasonable; (ii) certify the proposed class and appoint Class Counsel and the Class Representative; (iii) approve the Notice program as overviewed herein and as set forth in more detail in the Motion for Preliminary Approval including the form and content of the Notices which will be attached to the Motion for Preliminary Approval; and (iv) schedule a Final Approval hearing for a time and date mutually convenient for the Court, Named Plaintiff's Counsel and Defendant's Counsel, at which time the

Court will conduct an inquiry into the fairness of the [Proposed] Consent Judgment, determine whether it was made in good faith, finally certify the class, and determine whether to approve the [Proposed] Consent Judgment and Named Plaintiff's Counsel's application for attorneys' fees, costs and expenses (the "Final Approval Hearing").

Notice of the [Proposed] Consent Judgment shall be sent to all those set forth on Exhibit A [NEED TO OBTAIN LIST FROM THE RECORDS OF THE CITY OF SAVANNAH] which consists of the Tour Operators who tendered Preservation Fees to the City of Savannah from 2015 through 2020. The City of Savannah has no records of the payment of Preservation Fees by Tour Participants. The proposed notice to the Class Members shall include, among other information; a description of the material terms of the [Proposed] Consent Judgment; a description of the administration process; the timing of the calculation of individual refund amounts; a date by which the Class Members may object to the fee and expense motion; a date by which the Class Members may object to the calculation of individual refund amounts; the address of the webpage contained on the City of Savannah's website and visitsavannah.com where Class Members may access this [Proposed] Consent Judgment and other related documents and information; the date that the Final Approval Hearing will occur; and the procedure for the Class Members to object (the "Notice"). A form of Notice to be sent to the Class will be submitted to the Court as an Exhibit to the Motion for Preliminary Approval. Notice will be provided by U.S. Mail to the last known address for each Tour Operator set forth in Exhibit A. An advertisement will be placed in The Savannah Morning News and visitsavannah.com containing the information provided in the Notice and directing taxpayers to the webpage on the City of Savannah's website.

Objections to the [Proposed] Consent Judgment or to the Fee Petition (as described in Section E) must be mailed to the Clerk of Court, Named Plaintiff's Counsel and Defendant's

Counsel. For an objection to be considered by the Court, the objection must be received by the Court, Named Plaintiff's Counsel and Defendant's Counsel at least fifteen (15) days prior to the Final Approval Hearing. For an objection to be considered by the Court, the objection must also set forth:

- a. The name of the Lawsuit;
- b. The objector's full name, address and telephone number;
- c. An explanation of the basis upon which the objector claims to be a Class Member;
- d. All grounds for the objection, accompanied by any legal support for the objection known to the objector or the objector's counsel;
- e. The number of times the objector has objected to a class action settlement within the five (5) years preceding the date on which the objector files the objection, the caption of each case in which the objector has made such objection, and a copy of any orders or opinions to or ruling upon the objector's prior such objections that were issued by any court in each listed case;
- f. The identity of all counsel who represented the objector, including any former or current counsel who may be entitled to any compensation for any reason related to the objection to the Consent Judgment or to Fee Petition;
- g. The number of times the objector, his/her counsel and/or counsel's law firm have objected to a class action settlement within the last five (5) years preceding the date the objector files the objection, the caption of each case in which the counsel or the firm has made such objection, and a copy of any order or opinions related to or

ruling upon counsel or the firm's prior such objections that were issued by any court in each listed case;

- h. Any and all agreements that relate to the objection or the process of objecting – whether written or verbal – between the objector or objector's counsel and any other person or entity;
- i. The identity of all counsel representing the objector who will appear at the Final Approval Hearing;
- j. A list of all persons which will be called to testify at the Final Approval Hearing in support of the objection;
- k. A statement confirming whether the objector intends to personally appear and/or testify at the Final Approval Hearing; and
- l. The objector's signature (an attorney's signature is not sufficient).

The Court, in its discretion, may determine which, if any, Class Member(s) who objected and who requested to appear at the Final Approval Hearing will be entitled to appear and be heard. Any Class Member who fails to object in the manner set forth in this Section shall be deemed to have forever waived his or her objections and forfeit any and all rights the Class Member may otherwise have to appear separately and/or to object, and shall be bound by all the terms of this [Proposed] Consent Judgment and by all proceedings, orders and judgments in the Lawsuit.

E. Fees and Expenses

Class Counsel intends to file a motion for attorneys' fees and expenses to be awarded at least twenty (20) days prior to the Final Approval Hearing. Class Counsel intends to seek the

payment of attorneys' fees from the Aggregate Refund Fund plus documented out of pocket costs and expenses for prosecuting this action ("Fee Petition"). Any award of attorneys' fees, costs and expenses to Class Counsel shall be payable solely out of the Aggregate Refund Fund and is subject to Court approval. Defendant takes no particular position in favor or against the ultimate amount requested in such Fee Petition and intends to defer such decision to the judgment and discretion of the Court.

Following the date of notice to the Class as described below, the Court, if necessary, will hold a hearing to resolve any objections and pending motions and will determine the amount of fees and expenses to be paid to Class Counsel. Class Counsel's fees and expenses and fees regarding the administration of the Aggregate Refund Fund are collectively referred to as "Fees and Expenses". Fees and Expenses are to be paid from the Aggregate Refund Fund.

The Attorney's Fees and Expenses shall be paid to a Qualified Settlement Fund under Section 468B of the Internal Revenue Code to be identified and established prior to and to be specified in the Final Order.

Fees and expenses awarded by the Court to Class Counsel shall be payable from the Aggregate Refund Fund upon award and shall be paid by the Old Town Trolley QSF Administrator as follows:

- (1) 50% of the fees awarded and 100% of the expenses awarded on or before May 1, 2021;
- and
- (2) 50% of the fees awarded on or before May 1, 2022.

Fees and expenses awarded to Class Counsel shall be paid notwithstanding the existence of any timely filed objections thereto, or potential for appeal therefrom, or collateral attack on the award or this [Proposed] Consent Judgment or any part thereof, subject to Class Counsel's obligation to

make appropriate refunds or repayments to the Aggregate Refund Fund plus accrued interest at the same net rate as is earned by the Aggregate Refund Fund, if and when, as a result of any appeal and/or further proceedings on remand, or successful collateral attack, the fee or expense award is reduced or reversed.

F. Final Approval Order and Entry of Consent Judgment

Named Plaintiff shall file the Motion for Final Approval of Consent Judgment and the Fee Petition no later than seven (7) days prior to the date of the Final Approval Hearing. The Court, if necessary, will hold a hearing to resolve any objections properly submitted and enter the Consent Judgment and award attorneys' fees and expenses. The Motion for Final Approval of the Consent Judgment will contain a proposed Final Order in a form agreed to by Named Plaintiff's Counsel and Defendant's Counsel. Such Final Order shall, among other things:

- a. Finally certify the Class for settlement purposes pursuant to O.C.G.A. §9-11-23(e);
- b. Determine that the [Proposed] Consent Judgment is fair, adequate and reasonable;
- c. Determine that the Classes have been fairly and adequately represented;
- d. Determine that the Notice provided satisfies Due Process requirements;
- e. Enter a final order and judgment giving effect to the terms of this [Proposed] Consent Judgment;
- f. Rule on the Fee Petition and award Attorneys' Fees and Expenses as may be determined to be fair, adequate, and reasonable in the discretion of the Court;
- g. Bar and enjoin Named Plaintiff and all Class Members from asserting any of the Released Claims;

- h. Release Defendant and Released Parties as set forth in Section K(1);
- i. Direct the payment of the Aggregate Refund Fund as provided herein; and
- j. Reserve the Court's continuing and exclusive jurisdiction over the Parties to this [Proposed] Consent Judgment, to administer, supervise, construe and enforce this [Proposed] Consent Judgment in accordance with its terms;

G. Identification of Class Members and Calculation of Individual Refunds

Following Final Approval of the Consent Judgment, the Administrator is directed to identify the Class and Class Members and determine the refunds owed. Within fifteen (15) days of Final Approval, Defendant shall provide to the Administrator with the identity and last known contact information including name, mailing address, email and telephone number for all Tour Operators who paid Preservation Fees to Defendant from August 28, 2015 to 2020 including the amount of such payments. Defendant has no information or records of the direct payment of Preservation Fees by any Tour Participants. The Administrator shall be given full access to the records of and full cooperation by Defendant's departments including, but not limited to, Information Technology and the City of Savannah Revenue Department in order to identify Class Members, confirm the identity of Class Members, obtain missing information for taxpayers in order to determine whether they are Class Members and to calculate the individual refunds owed to Class Members.

The Administrator will first determine the total amount Preservation Fees paid from August 28, 2015 through 2020. In the event that the aggregate tax refunds owed is less than the Aggregate Refund Fund, the Administrator shall in addition to the tax refunds, calculate the prejudgment interest owed to each Class Member at the rate of 7.0% per annum as set by O.C.G.A. § 7-4-

2(a)(1)(A). Each Class Member determined to be entitled to a refund as provided herein shall receive the ratio of his or her calculated prejudgment interest over the total prejudgment interest calculated for all taxpayers applied to the amount of the Aggregate Refund Fund available for the payment of interest.

Next, the Administrator will identify the Tour Operator Subclass Members who are entitled to refunds and calculate the tax refunds due each Tour Subclass Member as set forth above.

Upon completion of the identification of the Tour Operator Subclass Members and the Preservation Fees paid by each from August 28, 2015 through 2020, the Administrator will post the list of Tour Operator Subclass Members and calculated refund amount owed to each (“Presumption Refund List”) on the City of Savannah’s website visitsavannah.com and provide notice in the Savannah Morning News providing opportunity for any Tour Participant Subclass Member to make a claim to any Preservation Fee charged to the Tour Participant Subclass Member by a Tour Operator. In order to be entitled to a refund, a Tour Participant Subclass Member shall be required to submit a receipt or other documentation reflecting the Tour Operator to whom the Preservation Fee was tendered. The documentation submitted by the Tour Participant Subclass Member must reflect the Preservation Fee was charged to the Tour Participant Subclass Member as a specific charge by the Tour Operator. The Preliminary Approval Order shall approve the form and content of a Tour Participant Claim Form. Additionally, any Tour Operator not listed on the Administrator’s Presumptive Refund List shall likewise be entitled to submit a claim. The Preliminary Approval Order shall approve the form and content of a Missing Tour Operator Claim Form to be used by Tour Operators not listed on the Presumptive Refund List. Tour Participants and Tour Operators not on the Presumptive Refund List shall have 45 days from publication of the Presumptive Refund List to submit claims. Any validly submitted and approved claim for refund

by a Tour Participant shall be deducted from the refund amount to be paid to the Tour Operator who charged the Tour Participant the Preservation Fee.

In the event that valid claims by Tour Operators not listed on the Presumptive Refund List are submitted and the total refunds owed including these claims is greater than the Aggregate Refund, then the calculated refund owed to all Class Members shall be adjusted so that each Class Member receives its pro rata share.

The Administrator will review any validly submitted claims of Tour Participants and Tour Operators not on the Preliminary Refund List and determine whether refunds are owed. Upon processing and evaluation of all claims of Tour Participants and Tour Operators not on the Presumptive Refund List and adjustment of refund calculations of all Class Members, the Administrator shall post a final list of those Class Members entitled to refunds and the amounts (“Final Refund List”) on the City of Savannah’s website and visitsavannah.com and provide notice of the same in the Savannah Morning News. The Administrator shall endeavor to publish the Final Refund List within six (6) months of the Court’s entry of the Final Approval Order and Entry of Consent Judgment.

The City of Savannah and Class Members shall have the right to object to the calculation of any individual refund calculations made by the Administrator set forth on the Final Refund List including asserting any individual defenses to such individual’s entitlement to the refund or the amount thereof. Such objection shall be filed with the Special Master as defined below within forty-five (45) days of the Administrator posting the Final Refund List on the City of Savannah’s website and visitsavannah.com . The Preliminary Approval Order will provide for the form of objections and required documentation for consideration of objections.

Any such objections shall be heard by the Special Master as defined below. The Special Master's ruling is final and binding, except as to questions of law, which are subject to review by the Judge and/or any appellate court of this state with jurisdiction over the subject matter.

Finally, the page on the City of Savannah's website will provide a form for any Tour Operator identified as a Class Member to utilize to update their address.

H. Administration of the Class

Rita Spalding is appointed Special Master to rule on any individual defenses or disputes in the individual refund calculation and administration process. The Special Master's decision shall be final and binding. The fees and expenses of the Special Master shall be paid from the Aggregate Refund Fund. In the event that Rita Spalding cannot serve, a substitute Special Master consented to by the Parties shall be appointed.

All Class Members identified by the Administrator as being entitled to refunds on the Final Refund List following resolution of all objections shall be the "Qualified Class Members" to whom refunds shall be paid as set forth below. The individual refund amounts shall be mailed to the Class Members in accordance with the timing procedures set forth below.

I. Qualified Class Member Refunds

Each Qualified Class Member will receive his or her pro-rata share of its calculated tax refund up to 100% of the total calculated refund due from the Aggregate Refund Fund, less Fees and Expenses (the "Pro-Rata Tax Refund"). "Pro rata" shall mean the proportion each Qualified Class Member's Pro-Rata Refund bears to the total Aggregate Refund Fund. This percentage shall be used to calculate each Qualified Class Member's pro rata share of the Fees and Expenses. Upon identification of all Qualified Class Members and determination of the Pro-Rata Tax Refund for each and determination of all Fees and Expenses, the Aggregate Refund Fund shall be divided by

the sum of the Pro-Rata Tax Refund for each Qualified Class Member. The resulting percentage shall be each Qualified Class Member's portion of the Fees and Expenses ("Pro-Rata Percentage of Fees and Expenses"). The product of the Pro-Rata Percentage of Fees and Expenses times the Fees and Expenses shall be deducted from the sum of each Qualified Class Member's Pro-Rata Tax Refund and the remainder shall be the amount distributed to each Qualified Class Member as set forth herein.

J. Refund Payment Process

Within thirty (30) days of the later of the expiration of the period for objecting to individual refund amounts or a final ruling by the Special Master on any objection to an individual refund calculation, the Administrators shall identify to the Old Town Trolley QSF Administrator the amount of refund due each Qualified Class Member and the address to which the refund is to be mailed (the "Administrator's Refund Payment List"). The address used for each Qualified Class Member will be the last known address on file with the Defendant or the updated address provided by the Qualified Class Member using the address form provided on the City of Savannah's webpage as described in Section G. The Old Town Trolley QSF Administrator shall issue refund checks to each Qualified Class Member from available funds in the Aggregate Refund Fund as follows:

- 1) 1/3 of the refund within fifteen (15) days of receipt of the Administrators' Refund Payment List;
- 2) 1/3 of the refund on or before May 1, 2022;
- 3) 1/3 of the refund on or before May 1, 2023.

Any and all checks returned or uncashed after one hundred and twenty (120) days from issuance shall be canceled by the Old Town Trolley QSF Administrator (the "Expiration Date").

Following the Expiration Date, all monies remaining in the Aggregate Refund Fund after all payments have been made as outlined herein shall be returned to the City of Savannah.

The Old Town Trolley QSF Administrator shall maintain accurate accounting records of all deposits and payments from the Aggregate Refund Fund Account and shall provide such accounting to Named Plaintiff's Counsel and Defendant's Counsel upon request. The Old Town Trolley QSF Administrator shall file a notice of completion of administration ("Notice of Completion"), the form of which shall be included in the Motion for Preliminary Approval, with the Court within thirty (30) days of completion of the administration and return of any remaining funds from the Aggregate Refund Fund Account to the City of Savannah.

K. General Provisions

1. Released Claims

Named Plaintiff and Class Members agree to release and forever discharge, and by this Agreement do, for themselves, their heirs, executors and administrators, release and forever discharge Defendant, its past, present and future parent and affiliate corporations, offices and departments, and their respective past, present and future divisions, subsidiaries, affiliates and related governmental entities and their successors, assigns, directors, officers, employees, attorneys, agents and representatives, personally and as directors, officers, employees, attorneys, agents, or representatives (collectively, the "Releasees"), of and from all manner of action and actions, causes and causes of action, sums of money, covenants, contracts, controversies, agreements, promises, damages (including, but not limited to, attorneys fees), claims and demands for the payment of taxes asserted in the Lawsuit related to or arising out of the levying of the Preservation Fee as alleged in the Complaint in this action for tax year 2015 through 2020 and every month therein whether in law or in equity (the "Released Claims").

2. Effect of Failure to Grant Final Approval

In the event that the Court fails to enter an Order granting Final Approval to this [Proposed] Consent Judgment, the Lawsuit shall resume, Defendant shall be given reasonable time to file an Answer commemorated by an additional Stipulation to be filed by the Named Plaintiff and the Defendant, this [Proposed] Consent Judgment and any Order granted pursuant to this [Proposed] Consent Judgment, including but not limited to the Preliminary Approval Order shall have no res judicata or collateral estoppel effect and shall be of no force or effect, and the Parties' rights and defenses shall be restored without prejudice as if this [Proposed] Consent Judgment had never been entered into unless either: (1) Named Plaintiff and Defendant agree in writing to a modification of the [Proposed] Consent Judgment and obtain approval of the [Amended Proposed] Consent Judgment with such agreed to modification, or (2) Named Plaintiff and Defendant successfully obtain reversal of the decision denying entry of the Order granting Final Approval to this [Proposed] Consent Judgment after reconsideration or appellate review.

3. Continuing Jurisdiction

The Court shall retain jurisdiction over the interpretation and implementation of this [Proposed] Consent Judgment, as well as any matters arising out of, or related to, the interpretation or implementation of this [Proposed] Consent Judgment.

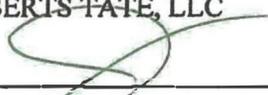
SO ORDERED. This 23rd day of February, 2021.



Judge

I HAVE READ THIS [PROPOSED] CONSENT JUDGMENT CAREFULLY AND FULLY UNDERSTAND AND AGREE TO SAME ON BEHALF OF ALL CLASS MEMBERS.

ROBERTS-TATE, LLC

BY: 

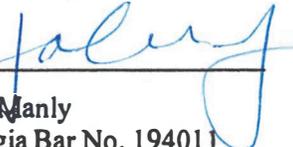
James L. Roberts, IV
Georgia Bar No. 608580
jroberts@robertstate.com

ATTORNEYS FOR PLAINTIFFS

Post Office Box 21828
St. Simons Island, Georgia 31522
(912) 638-5200
(912) 638-5300 – Fax

I HAVE READ THIS [PROPOSED] CONSENT JUDGMENT CAREFULLY AND FULLY UNDERSTAND AND AGREE TO SAME ON BEHALF OF ALL CLASS MEMBERS.

MANLY SHIPLEY, LLP

BY: 

John Manly
Georgia Bar No. 194011
john@manlyshipley.com
James E. Shipley, Jr.
jim@manlyshipley.com
Georgia Bar No. 116508

104 West State Street, Suite 220
P.O. Box 10840
Savannah, GA 31412

ATTORNEYS FOR NAMED
PLAINTIFF

I HAVE READ THIS [PROPOSED] CONSENT JUDGMENT CAREFULLY AND FULLY UNDERSTAND AND AGREE TO SAME ON BEHALF OF DEFENDANT.

BY: 

R. Bates Lovett, Esquire
City Attorney
6 East Bay Street
Gamble Building, 3rd Floor
Savannah, GA 31401

ATTORNEYS FOR DEFENDANT

Number	Tour Companies	Address	City	State	Zip
1	13TH COLONY TOURS	701 HARMON ST	SAVANNAH	GA	31401
2	21 TOURS	28 SHEFTALL CV	SAVANNAH	GA	31410
3	40 ACRES AND A MULE TOUR	119 DYCHES DR	SAVANNAH	GA	31406
4	A WALK THROUGH SAVANNAH	8 S ROCKWELL AVE	SAVANNAH	GA	31419
5	ADVENTURE TOURS IN MOTION	301 TATTNALL ST	SAVANNAH	GA	31401
6	ADVENTURES IN SAVANNAH	624 BEAUREGARD ST	SAVANNAH	GA	31405
7	AFTERLIFE TOURS	212 KINZIE AVE W	SAVANNAH	GA	31404
8	ALL ABOUT SAVANNAH TOURS	P O BOX 666	SAVANNAH	GA	31402
9	ARCHITECTURAL TOURS OF SAVANNAH LLC	P O BOX 8572	SAVANNAH	GA	31412
10	ART AND AMBLE LLC	PO BOX 9293	SAVANNAH	GA	31412
11	BEYOND THE BORDERS TRAVEL LLC	111 HOVER CREEK RD	SAVANNAH	GA	31419
12	BEYOND THE MOSS	103 BRADY ST	SAVANNAH	GA	31401
13	BLACK BETTY'S TOURS, LLC	P O BOX 15861	SAVANNAH	GA	31406
14	BLACK EYE WHITE EYE WALKING TOURS	6929 DAMASCUS RD	SAVANNAH	GA	31406
15	BLUE MOON	9902 FERGUSON AVE LOT 38	SAVANNAH	GA	31405
16	BLUE ORB TOURS	1130 BOB HARMON RD 262	SAVANNAH	GA	31408
17	BONNIE BLUE TOURS	2303 ATLANTIC AVE UNIT	SAVANNAH	GA	31401
18	BROKEN COMPASS TOURS	119 ROSE DHU WAY	SAVANNAH	GA	31419
19	CAPTURING SAVANNAH	35 BARNARD ST APT 300	SAVANNAH	GA	31401
20	CARRIAGE TOURS OF SAVANNAH	P O BOX 2402	SAVANNAH	GA	31412
21	CLASSIC SAVANNAH TOURS	1403 WHITFIELD PARK CIR	SAVANNAH	GA	31406
22	CLASSIC SOUTHEAST TOURS	7306 GA HWY 21 STE 101-11	SAVANNAH	GA	31407
23	CLASSROOM W/O WALLS	201 W ANDERSON	SAVANNAH	GA	31401
24	COBBLESTONE CONNECTIONS	28 BARTOW POINTE RD	SAVANNAH	GA	31404
25	COBBLESTONE TOURS, INC	510 E 64TH ST	SAVANNAH	GA	31405
26	CONVENTION CONSULTANTS	117 PERRY ST W	SAVANNAH	GA	31401
27	COOL PLACES LLC	42 E BAY ST	SAVANNAH	GA	31401
28	COTTON BLOSSOM TOURS	100 BALFOUR DR	RICHMOND HILL	GA	31324
29	DAVENPORT HOUSE MUSEUM	324 E STATE ST	SAVANNAH	GA	31401
30	DAY CLEAN: THE AFRICAN SOUL, INC	P O BOX 10934	SAVANNAH	GA	31412
31	DESTINATION MANAGEMENT	1107 WILMA ST	SAVANNAH	GA	31401
32	DISCOVER SAVANNAH TOURS LLC	35 BARNARD ST STE 300	SAVANNAH	GA	31401
33	DOLPHIN MAGIC TOURS	4 LYMAN HALL CT	SAVANNAH	GA	31410
34	EXPLORATION POINT	P. O. BOX 11023	SAVANNAH	GA	31412
35	EXPLORE SAVANNAH	13 MAD TURKEY CRSS	SAVANNAH	GA	31411
36	FOOTPRINTS OF SAVANNAH	1010 W 42ND ST	SAVANNAH	GA	31405
37	FREE SAVANNAH TOURS	601 CONGRESS ST E UNIT E	SAVANNAH	GA	31401
38	FULL MOON TOURS	430 HABERSHAM ST	SAVANNAH	GA	31401
39	GHOST CITY TOURS	643 MAGAZINE ST 304	ST NOLA	LA	70130
40	GHOST TALK GHOST WALK	1328 CROSSBROOK PL	SAVANNAH	GA	31406
41	GHOSTWALKERS TOURS	160 CLARKTOWN RD	RICHMOND HILL	GA	31324
42	GINNY HOWELL TOURS	46 LANIER RD STE B	JEKYLL ISLAND	GA	31527
43	GRITS AND MAGNOLIAS TOURS	216 1/2 E JONES ST	SAVANNAH	GA	31401
44	HAUNTED SAVANNAH PUB CRAWL	352 OXFORD DR	SAVANNAH	GA	31405

45	HAUNTED SAVANNAH TOURS	212 KINZIE AVE	SAVANNAH	GA	31404
46	HAUNTING TOURS INC	409 HUNTINGDON ST E APT	SAVANNAH	GA	31401
47	HEARSE TOURS	412 DUFFY E APT B	SAVANNAH	GA	31401
48	HISTORIC CHURCH TOURS	1409 DALE DR	SAVANNAH	GA	31406
49	HISTORIC SAVANNAH BY FOOT	33 OAK PARK PT	SAVANNAH	GA	31405
50	HISTORIC SAVANNAH CARRIAGE	100 ABERDEEN ST	SAVANNAH	GA	31401
51	HISTORIC SAVANNAH ON THE RUN	115 E 33RD ST	SAVANNAH	GA	31401
52	HYSTERICAL HISTORY TOUR	1706 E 50TH ST	SAVANNAH	GA	31401
53	JONES STREET PRODUCTIONS INC DBA 6TH SENSE	P O BOX 2567	RINCON	GA	31326
54	JOURNEY BY FAITH	609 1/2 W 36TH ST	SAVANNAH	GA	31415
55	KELLY TOURS	2788 HWY 80 W	GARDEN CITY	GA	31408
56	LINDA SHONKA	123 MAHAFFEY DR	RICHMOND HILL	GA	31324
57	MAD CAT TOURS	711 E 40TH ST	SAVANNAH	GA	31401
58	MADISON TOURS CO.	P O BOX 893	EDEN	GA	31351
59	MAGNOLIA CARRIAGE TOURS	P O BOX 2402	SAVANNAH	GA	31412
60	McLACHIAN ENTERTAINMENT, LLC D/B/A SAVANNAH TASTEEXPERIENCE	P O BOX 31118	SAVANNAH	GA	31410
61	MY CITY SAVANNAH TOUR c/o Norman Hugley	548 E DUFFY ST	SAVANNAH	GA	31401
62	NIGHTLY SPIRITS	625 CLAYTON ST	DENVER	CO	80206
63	NO WORRIES PHOTOGRAPHY LLC	317 E HUNTINGDON LN	SAVANNAH	GA	31401
64	NOBLE JONES TOURS	1901 KANSAS AVE	SAVANNAH	GA	31404
65	OGLETHORPE TOURS OF SAVANNAH LLC	P O BOX 2324	SAVANNAH	GA	31402
66	OGLETHORPE'S SAVANNAH TOURS	2619 LIVINGSTON AVE	SAVANNAH	GA	31405
67	OH SO SOCIAL TOURS LLC	35 BARNARD ST STE 300	SAVANNAH	GA	31401
68	OLD CITY WALKS	12 1/2 W TAYLOR ST	SAVANNAH	GA	31401
69	OLD SAVANNAH TOURS	41 WAHLSTROM RD	SAVANNAH	GA	31404
70	OLD TOWN TROLLEY TOURS OF SAVANNAH, INC	1115 LOUISVILLE RD	SAVANNAH	GA	31415
71	OLE BONES TOURS	24 NORWOOD CT	SAVANNAH	GA	31401
72	OLIVER BENTLEYS LLC	13 W YORK ST	SAVANNAH	GA	31401
73	ONCE UPON A TIME IN OLD SAVANNAH	608 HAMMOCKS	SAVANNAH	GA	31410
74	ORLANDO MONTOYA TOURS	409 CRANMAN DR	SAVANNAH	GA	31406
75	P B IN J TOURS	P O BOX 2653	SAVANNAH	GA	31402
76	P B N J TOURS	P O BOX 2653	SAVANNAH	GA	31402
77	PEDALS ECO-ENTERTAINMENT LLC	17 BOSTWICK DR	POOLER	GA	31401
78	PERSONALIZE TOURS OF SAVANNAH	425 PRESIDENT E	SAVANNAH	GA	31401
79	PIRATES & PRIVATEERS/SAVANNAH	1506 51ST ST E	SAVANNAH	GA	31404
80	PLANTATION CARRIAGE CO	88 RANDOLPH ST	SAVANNAH	GA	31401
81	PML TRAVEL & TOURS	750 S ROUTE 73 STE 204	MARLTON	NJ	08053
82	PRIVATE WALKING TOURS OF SAVANNAH	501 E CHARLTON ST	SAVANNAH	GA	31401
83	RACHEL PERKINS PREMIUM TALKS AND TOURS	2612 WHATLEY AVE UNIT 2	SAVANNAH	GA	31404
84	REMEMBER SAVANNAH TOURS	10 S STILLWOOD CT	SAVANNAH	GA	31419
85	RIVER STREET RIVERBOAT CO.	P O BOX 10086	SAVANNAH	GA	31412
86	RIVERSTREET RAMBLES LLC	407 1/2 HARMON ST	SAVANNAH	GA	31401
87	SAV TOURS FOR TIPS	318 E GASTON ST APT 8	SAVANNAH	GA	31401
88	SAVANNAH ARCHITOURS	202 ATKINSON AVE APT	SAVANNAH	GA	31404
89	SAVANNAH BELLE WALKING TOURS	22 LITTLE RIVER DR	SAVANNAH	GA	31419

90	SAVANNAH BIKE TOURS	41 HABERSHAM ST	SAVANNAH	GA	31401
91	SAVANNAH BREWS CRUISE	507 E CHARLTON ST	SAVANNAH	GA	31401
92	SAVANNAH BY FOOT	527 GORDON ST E	SAVANNAH	GA	31401
93	SAVANNAH CULTURAL TOURS	114 BULL ST	SAVANNAH	GA	31401
94	SAVANNAH DAN TOURS	2212 1/2 43RD E	SAVANNAH	GA	31404
95	SAVANNAH DESTINATION MANAGEMENT	2 SETTLEMENT CT	SAVANNAH	GA	31410
96	SAVANNAH FOOTNOTES, LLC	1702 E 50TH ST	SAVANNAH	GA	31404
97	SAVANNAH GHOST LEGENDS	9 W YORK ST APT 207B	SAVANNAH	GA	31401
98	SAVANNAH GHOST SHOW	35 BARNARD ST STE 300	SAVANNAH	GA	31401
99	SAVANNAH HERITAGE TOURS	450 PRICE ST	SAVANNAH	GA	31401
100	SAVANNAH HISTORY & HAUNTS	519 EAST GASTON ST APT B	SAVANNAH	GA	31401
101	SAVANNAH HISTORY RUN LLC	815 E VICTORY DR	SAVANNAH	GA	31405
102	SAVANNAH MILITARY TOURS LLC	645 INDIAN ST STE 101	SAVANNAH	GA	31401
103	SAVANNAH MOVIE TOURS	P O BOX 30098	SAVANNAH	GA	31410
104	SAVANNAH ON WHEELS	106 W GWINNETT ST UNIT 1-C	SAVANNAH	GA	31401
105	SAVANNAH PUB TOURS	1640 BELLE ISLAND RD	RICHMOND HILL	GA	31324
106	SAVANNAH RAMBLES LLC	526 E PRICE ST	SAVANNAH	GA	31401
107	SAVANNAH SEEN INC	426 ABERCORN ST	SAVANNAH	GA	31401
108	SAVANNAH SIDEWALK TOURS	816 BARNARD ST	SAVANNAH	GA	31401
109	SAVANNAH SLOW RIDE	524 BOLTON ST E APT B	SAVANNAH	GA	31401
110	SAVANNAH SOJOURNS	78 WINDING OAK DR	OKATIE	SC	29909
111	SAVANNAH SUPERNATURAL TOURS	7206 JOHNNY MERCER BLVD	SAVANNAH	GA	31410
112	SAVANNAH TASTE EXPERIENCE	P O BOX 31118	SAVANNAH	GA	31401
113	SAVANNAH TERRORS	100 BULL ST STE 200	SAVANNAH	GA	31401
114	SAVANNAH TOUR DU TOUR	10014 WHITE BLUFF RD APT 1007	SAVANNAH	GA	31406
115	SAVANNAH TOUR WALKS	512 W 40TH ST	SAVANNAH	GA	31415
116	SAVANNAH TOURS AND TALES	203 E 39TH ST APT 13	SAVANNAH	GA	31401
117	SAVANNAH WALKING TOURS	9804 WHITEFIELD AVE APT A	SAVANNAH	GA	31406
118	SAVANNAH WALKS	37 ABERCORN ST	SAVANNAH	GA	31401
119	SAVVY SAVANNAH TOURS	212 WILMINGTON IS RD	SAVANNAH	GA	31410
120	SEAN WESLEY HOLLERAN	233 E GORDON ST APT 1	SAVANNAH	GA	31401
121	SEE HISTORIC SAVANNAH	215 ISLAND CREEK LN	SAVANNAH	GA	31410
122	SEEIN' SAVANNAH C/O VIRGINIA HOLCOMB	1322 OLD IVY WAY	MOUNT PLEASANT	SC	29466
123	SEEING SAVANNAH ON THE RUN	203 COPPERTALE CT	RINCON	GA	31326
124	SEGWAY OF SAVANNAH	234 MLK JR BLVD	SAVANNAH	GA	31401
125	SINISTER SOUTHERN SPIRITS	12008 MIDDLEGROUND RD APT Q3	SAVANNAH	GA	31419
126	SIP & CYCLE LLC	1002 MONTGOMERY ST	SAVANNAH	GA	31401
127	SIP N' SHOP SAVANNAH TOURS	14 HARVEY DR	RICHMOND HILLS	GA	31324
128	SIXTH SENSE SAVANNAH	P O BOX 2567/108 CYPRESS DR RINCON	SAVANNAH	GA	31405
129	SO YOU NEVER FORGET TOURS PLUS	515 SEILER AVE	SAVANNAH	GA	31401
130	SORREL-WEED HOUSE TOURS	6 W HARRIS ST	SAVANNAH	GA	31401
131	SOUL SQUARES WALKING TOURS	1305 BARNARD ST STE 52	SAVANNAH	GA	31401
132	SOUTHERN FLAVORS SAVANNAH	2204 GREENWOOD ST	SAVANNAH	GA	31404
133	SOUTHERN STOLLS,LLC	45 PINEAPPLE DR	BLUFFTON	SC	29909
134	SPECTRAL SAVANNAH LLC	2126 E VICTORY DR BOX 286	SAVANNAH	GA	31404

135	SPIRIT OF OLD SAVANNAH TOURS/ EVELENE STEVENSON	19 BATTERY LN	BEAUFORT	SC	29902
136	SPIRITS OF SAVANNAH TOURS LLC/ TALES OF A MEDIUM TOURS	13 MARY MUSGROVE DR	SAVANNAH	GA	31410
137	SPIRITS OF SAVANNAH, LLC	15 E 39TH ST	SAVANNAH	GA	31401
138	STEVE ALVIN SPOOKY SAVANNAH GHOST TOURS	115 LINDEN DR	SAVANNAH	GA	31405
139	STEVE ELLIS WALKING TOURS	8993 FERGUSON AVE	SAVANNAH	GA	31406
140	STROLL SAVANNAH	137 BULL ST	SAVANNAH	GA	31401
141	STUNDENTS SEE SAVANNAH INC	202 LIBERTY ST E	SAVANNAH	GA	31401
142	TAILOR MADE TOURS	18 BONAVENTURE RD	SAVANNAH	GA	31404
143	TAMMY TOURS LLC	118 1/2 EAST JONES STREET	SAVANNAH	GA	31401
144	TARA TOURS	127 BERKSHIRE LN	PALM COAST	FL	32137
145	THE AMERICAN TOUR COMPANY	152 DOVETAIL CRSS	SAVANNAH	GA	31419
146	THE BEST SAVANNAH TOUR C/O MICHAELS MEDIA LLC	24 E LIBERTY STREET	SAVANNAH	GA	31401
147	THE FREEDOM TRAIL	519 HARTRIDGE ST	SAVANNAH	GA	31401
148	THE GREAT TAKEOVER	3 HIGHWATER CT	SAVANNAH	GA	31410
149	THEODORA ASH TOURS, LLC	1305 BARNARD ST UNIT 58	SAVANNAH	GA	31401
150	THOMPSON SPECIALTY TOURS	13 ARTHUR ST	SAVANNAH	GA	31406
151	TIMELESS TOURS OF SAVANNAH	210 CALLEY RD	SAVANNAH	GA	31410
152	TOM SERVICES, LLC	1014 WELCH ST	SAVANNAH	GA	31410
153	TOUR GUIDE INSTITUTE OF SAV.	12 E JONES LN	SAVANNAH	GA	31401
154	TRAVEL THRU TIME TOURS	3710 ABERCORN ST	SAVANNAH	GA	31405
155	TRUTH IN EVIDENCE HAUNTED TOURS LLC	2900 GARDEN HILLS LOOP	RICHMOND HILL	GA	31324
156	UNDERGROUND TOURS OF SAVANNAH LLC	5605 ACL BLVD	SAVANNAH	GA	31405
157	VICTORIAN LADY TOURS	321 E 55TH ST	SAVANNAH	GA	31405
158	WALK WITH ME SAVANNAH TOURS	2 E BRYAN ST	SAVANNAH	GA	31401

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

OLD TOWN TROLLEY TOURS OF SAVANNAH, INC.)	
)	
Plaintiff,)	CIVIL ACTION NO. SPCV20-007667-MO
)	
v.)	
)	
THE MAYOR AND ALDERMEN OF THE CITY OF SAVANNAH)	
)	
)	
Defendants.)	

FIRST AMENDMENT TO [PROPOSED] CONSENT JUDGMENT ON AGGREGATE REFUND AND ORDER

This First Amendment to [Proposed] Consent Judgment on Aggregate Refund and Order (the “First Amendment”) is being entered this 25th day of November, 2020 by and between Plaintiff Old Town Trolley Tours of Savannah, Inc. (“Named Plaintiff”), individually and on behalf of all persons similarly situated and Defendant the Mayor and Aldermen of the City of Savannah (the “City of Savannah”).

WHEREAS, the Parties entered into a [Proposed] Consent Judgment on Aggregate Refund and Order to settle the above referenced matter; and

WHEREAS, the Parties desire to correct a typographical error in the [Proposed] Consent Judgment on Aggregate Refund and Order,

NOW, THEREFORE, for and in consideration of the mutual and reciprocal promises, covenants, and agreements, including the agreement to settle the above referenced matter, and for other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged and stipulated, the Parties hereby CONSENT, STIPULATE, AND AGREE as follows:

1. Section I of the [Proposed] Consent Judgment on Aggregate Refund and Order, titled “Qualified Class Member Refunds” is hereby deleted in its entirety and the following inserted in lieu thereof:

I. Qualified Class Member Refunds

Each Qualified Class Member will receive his or her pro-rata share of its calculated tax refund up to 73.89% of the total calculated refund due from the Aggregate Refund Fund, less Fees and Expenses (the “Pro-Rata Tax Refund”). “Pro rata” shall mean the proportion each Qualified Class Member’s Pro-Rata Refund bears to the total Aggregate Refund Fund. This percentage shall be used to calculate each Qualified Class Member’s pro rata share of the Fees and Expenses. Upon identification of all Qualified Class Members and determination of the Pro-Rata Tax Refund for each and determination of all Fees and Expenses, the Aggregate Refund Fund shall be divided by the sum of the Pro-Rata Tax Refund for each Qualified Class Member. The resulting percentage shall be each Qualified Class Member’s portion of the Fees and Expenses (“Pro-Rata Percentage of Fees and Expenses”). The product of the Pro-Rata Percentage of Fees and Expenses times the Fees and Expenses shall be deducted from the sum of each Qualified Class Member’s Pro-Rata Tax Refund and the remainder shall be the amount distributed to each Qualified Class Member as set forth herein.

2. Except as herein modified, all other terms and conditions of the [Proposed] Consent Judgment on Aggregate Refund and Order shall remain in full force and effect. The First Amendment may be executed in multiple counterparts, each of which shall be deemed an original and all of which constitute one and the same agreement.

[SIGNATURE PAGE FOLLOWS]

I HAVE READ THIS FIRST AMENDMENT TO THE [PROPOSED] CONSENT JUDGMENT CAREFULLY AND FULLY UNDERSTAND AND AGREE TO SAME ON BEHALF OF ALL CLASS MEMBERS.

ROBERTS TATE, LLC

BY: /s/ James L. Roberts, IV

James L. Roberts, IV
Georgia Bar No. 608580
jroberts@robertstate.com

ATTORNEYS FOR PLAINTIFFS

Post Office Box 21828
St. Simons Island, Georgia 31522
(912) 638-5200
(912) 638-5300 – Fax

I HAVE READ THIS FIRST AMENDMENT TO THE [PROPOSED] CONSENT JUDGMENT CAREFULLY AND FULLY UNDERSTAND AND AGREE TO SAME ON BEHALF OF ALL CLASS MEMBERS.

MANLY SHIPLEY, LLP

BY: /s/ John Manly

John Manly
Georgia Bar No. 194011
john@manlyshipley.com
James E. Shipley, Jr.
jim@manlyshipley.com
Georgia Bar No. 116508

104 West State Street, Suite 220
P.O. Box 10840
Savannah, GA 31412

ATTORNEYS FOR NAMED
PLAINTIFF

I HAVE READ THIS FIRST AMENDMENT TO THE [PROPOSED] CONSENT JUDGMENT CAREFULLY AND FULLY UNDERSTAND AND AGREE TO SAME ON BEHALF OF DEFENDANT.

BY: /s/ R. Bates Lovett

R. Bates Lovett
Georgia Bar No. 459568
City Attorney
Jennifer N. Herman
Georgia Bar No. 327017
Deputy City Attorney
P. O. Box 1027

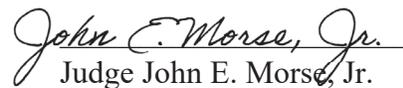
Savannah, GA 31402
BLovett@Savannahga.Gov
JHerman@Savannahga.Gov

BY: /s/ Patrick T. O'Connor

Patrick T. O'Connor
Georgia Bar No. 548425
Patricia T. Paul
Georgia Bar No. 697845
OLIVER MANER LLP
P. O. Box 10186
Savannah, GA 31412
pto@olivermaner.com
ppaul@olivermaner.com

ATTORNEYS FOR DEFENDANT

So ORDERED this 23rd day of February, 2021


Judge John E. Morse, Jr.