

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

RAMAH NAVAJO CHAPTER,  
OGLALA SIOUX TRIBE, and PUEBLO  
OF ZUNI, for themselves and on behalf  
of a class of persons similarly situated,

Plaintiffs,

vs.

No. CIV 90-0957 LH/WWD ACE

GALE NORTON, Secretary of the  
Interior, in her official capacity,  
UNITED STATES DEPARTMENT OF  
INTERIOR, NEIL McCALEB, Assistant  
Secretary of Interior for Indian Affairs,  
in his official capacity, EARL DEVANEY,  
Inspector General, in his official capacity,  
and UNITED STATES OF AMERICA,

Defendants

**RELEASE OF CLAIMS**

In consideration of the mutual agreements and undertakings set out in the parties' Second Partial Settlement Agreement of \_\_\_\_\_ (Docket No. \_\_\_\_ ) and payment by Defendants of the Settlement Amount as defined in Section III.A of the Second Partial Settlement Agreement, the receipt of which is hereby acknowledged, the Class, as defined in Section I.C.5 of the Agreement, including each of the Named Plaintiffs and each individual member of the Class ("Plaintiffs"), hereby release and discharge the Defendants, as defined in Section I.C.6 of the Agreement, from all Settled Claims as defined in Section II.A of the Second Partial Settlement Agreement.

**COUNSEL FOR PLAINTIFFS AND THE CLASS**

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MICHAEL P. GROSS, Class Counsel

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C. BRYANT ROGERS, Class Co-Counsel

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LLOYD B. MILLER, Class Co-Counsel  
For the Direct CSC Claim