

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DOE ONE and DOE TWO,)	
)	
Plaintiffs,)	
)	
v.)	No: CA-
)	
KEYSTONE SCHOOL DISTRICT and JOHN)	
R. SLAGLE, in his official capacity as school)	
board president,)	
)	
Defendants.)	
_____)	

CONSENT DECREE

And now, this ____ day of May, 2005, it is hereby ORDERED, ADJUDGED and DECREED as follows:

1. Defendants, Keystone School District and School Board President John R. Slagle, and the District's employees, elected officials, representatives, agents, servants, assigns and all others acting on the District's behalf or in concert with it (hereafter "Defendants"), shall (1) not recite or allow to be recited any prayers, be they called an invocation, benediction or anything else, as part of the May 27, 2005, graduation ceremony; and (2) immediately cease reciting publicly prayers at School Board meetings.
2. This Order has been entered based on a negotiated settlement between the parties and is not to be construed as an admission of liability by any party.
3. The Defendants shall reimburse Plaintiffs' counsel for the cost of the filing fee, i.e., \$250. Otherwise, the parties shall bear their own costs and fees.
4. Besides the costs and attorneys' fees discussed in the foregoing paragraph, the parties mutually do hereby for themselves, their heirs, and any and all assignees release, quitclaim, and forever discharge each other from any and all claims, counterclaims, rights, demands,

costs, damages, losses, liabilities, actions, and causes of action, legal expenses and court costs, known and unknown, now and in the future, arising out of the facts contained in the Verified Complaint or in any way related to the claims asserted in this case.

5. This Court shall retain jurisdiction to enforce the terms of this Consent Decree for a period of five (5) years from this date. Plaintiffs are entitled to petition for costs and attorneys' fees if they bring a successful contempt petition or motion.
6. The clerk shall mark this case closed and discontinued.

John R. Slagle, Board President
Keystone School District

Witold J. Walczak
For the Plaintiffs

Henry D. Sinopoli, Superintendent
Keystone School District

Carl P. Beard, Esq.

For the Defendants

IT IS SO ORDERED, this _____ day of May, 2005.

U.S.D.J.