



Request for Regulation Amendment

to incorporate Revised Stipulation Agreement into Town Zoning Code

Regulation Amendment

Lime Rock Park requests that the Planning & Zoning Commission of the Town of Salisbury amend the Town of Salisbury Zoning Code to adopt the attached revised Stipulation Agreement. This Stipulation will be considered by Judge Lynch in the Superior Court for the Judicial District of Litchfield at Torrington, on May 12, 2026. The proposed regulation amendment is consistent with the Town Plan of Conservation and Development, which recognizes Lime Rock Park as a long-established facility. The proposed amendment will only update and improve facility operations.

Background

Lime Rock Park II, LLC (LRP) and the Steering Committee of the Lime Rock Citizens Council (LRCC) have been collaborating for 4+ years to develop agreed amendments to the Stipulation Agreement that governs the activities of Lime Rock Park in Lakeville, CT. The two parties have reached satisfactory agreement, resulting in the amended Stipulation currently under consideration by Judge Lynch at the Superior Court for the Judicial District of Litchfield at Torrington. Originally submitted by counsel to the Court in November, 2025 and subsequently through the hearing process with the Judge, the Stipulation will be considered by Judge Lynch on May 12, 2026.

Process Timeline

The following provides an approximate timeline of activities related to the collaborative process between LRCC and LRP to amend the 1988 Stipulation Agreement that governs the activities of Lime Rock Park. This Stipulation Agreement originally dates to 1959, and was subsequently amended in 1966, 1968, and most recently in 1988.

Apr, 2021 LRP II, LLC formed with acquisition of LRP - new owners and management

Aug, 2021 LRP first participates in Town of Salisbury PZC meetings

LRP hosts open discussion with neighbors to introduce Park's new ownership/management and to discuss planned LRP activities

Nov, 2021 LRP and LRCC first meet to discuss potential amendments to Stipulation Agreement

2022-2025 Ongoing collaboration between LRCC and LRP to draft proposed amendments, with periodic updates to Town PZC regarding progress

Dec, 2023 First draft Amendment to Stipulation Agreement

May, 2025 Final draft Amendment to Stipulation Agreement to attorneys and agreement among LRCC and LRP to proceed as one

Jul, 2025 LRCC Steering Committee letter to all LRCC members (300+) detailing changes to LRP Stipulation Agreement, with no negative feedback or response from LRCC members.

Fall, 2025 Materials finalized for attorneys to submit to Superior Court for the Judicial District of Litchfield at Torrington

Nov, 2025 Motion to Court to Reopen Judgment and Amend Stipulation Agreement

Feb, 2026 Parties and counsel participate in hearing with Judge Lynch at Superior Court in Torrington in which Judge requests procedural changes, requiring new court date

May 12, 2026 Next court date with Judge Lynch in Torrington

May 18, 2026 Regular meeting of Planning & Zoning Commission, Town of Salisbury

May 21, 2026 First scheduled Thursday unmuffled race event at Lime Rock Park per terms of agreed Amended Stipulation Agreement.

No. LLI-CV-58-0015459-S : SUPERIOR COURT
:
LIME ROCK CITIZENS COUNCIL, LLC : JUDICIAL DISTRICT OF LITCHFIELD
:
vs. : AT TORRINGTON
:
LIME ROCK PARK II, LLC : MARCH 3, 2026

MOTION TO AMEND STIPULATED INJUNCTION

WHEREAS, this Court entered a judgment and injunctive order dated May 12, 1959, which order was amended by stipulated agreement on March 2, 1966, on August 26, 1968, and on March 3, 1988 (copy attached as Exhibit A); and

WHEREAS, the plaintiff, Lime Rock Citizens Council, LLC (“LRCC”) and the defendant Lime Rock Park II, LLC (“LRP”), as successors to the parties to the prior 1988 stipulated injunction, desire to make certain changes in the judgment and injunctive order; and

WHEREAS, notice to all other parties has been provided by mail as directed by the Court in a Motion for Order granted by this Court:

NOW THEREFORE, LRCC and LRP hereby stipulate and request that the 1988 stipulated judgment and injunctive order be amended to state as follows:

- I. All activity of muffled or unmuffled racing cars upon the asphalt track or in the paddock areas shall be prohibited on Sundays.

- II. Activity with muffled racing car engines shall be permitted as follows:
 - a) On any day Monday through including Saturday between 9:00 a.m. and 6:00 p.m.; and
 - b) Permissible mufflers are those which meet the standards set forth in Section 14-80(c) of the General Statutes of Connecticut, Revision of 1959, or as the same may be amended from time to time.

- III. Activity with unmuffled racing car engines shall be permitted as follows:
 - a) On Tuesday afternoon, not more than twenty-three (23) days in a calendar year, between 12:00 noon and 6:00 p.m.
 - b) On Saturdays, not more than ten (10) days in each calendar year, between the hours of 9:00 a.m. and 6:00 p.m.

- c) On the ten (10) Fridays which precede the said ten (10) Saturdays between the hours of 9:00 a.m. and 6:00 p.m.
 - d) On three (3) Thursdays per year, as part of scheduled unmuffled weekend racing, between 9:00 a.m. and 6:00 p.m.
 - e) There will be no unmuffled racing on the Monday and Tuesday preceding the three weeks in which Thursday to Saturday racing is scheduled.
 - f) In such event the scheduled racing for any of the said ten (10) Saturdays must be rescheduled for a “rain date,” then the said “rain date” and the Friday preceding it shall not be considered as one of the ten (10) days referred to in Paragraphs (b) and (c) above.
 - g) On Memorial Day, Fourth of July and Labor Day between the hours of 9:00 a.m. and 6:00 p.m.:
 - 1. In the event any of said holidays falls on a Tuesday, Thursday, or a Friday, there may be unmuffled activity on the day preceding the holiday between the hours of 12:00 noon and 6:00 p.m., but in such event the permissible unmuffled racing activity on the next Tuesday preceding any of the said holidays, as allowed by § III a), shall be forfeited.
 - 2. In the event any of said holidays fall on a Sunday, the next day (Monday) will be considered the holiday of these purposes.
- IV. Prohibited activity upon the track property shall include the revving or testing of muffled or unmuffled car engines on Saturdays and holidays referenced in § III g), prior to 9:00 a.m. and after 6:00 p.m., excepting the transportation of said vehicles to and from the paddock areas on or off their respective trailers, which transporting, unloading or loading shall not commence before 7:30 a.m. or extend beyond 7:30 p.m.
- V. The use of the track loudspeakers before 8:00 a.m. and after 7:00 p.m. is prohibited. Prior to 9:00 a.m. or after 6:00 p.m., including on all Sundays, the loudspeakers will be used in the inward-facing paddock facing areas only, and if needed, for emergency announcements.
- VI. A “racing car” is defined as any car entered in an event on an asphalt track.
- VII. Racing of motorcycles is prohibited. Nevertheless, specifically permitted are non-racing motorcycle activities including but not limited to demonstrations, instruction, timing, testing, practice and photography.
- VIII. Stand-alone “Drifting” events are prohibited. Under the following conditions, drifting demonstrations are permitted: such demonstrations will be held only on scheduled unmuffled days and no more than once per year on two consecutive days; there will be no more than three demonstration sessions on each day of not more than 15 minutes each; at no time will there be more than 10 cars on track

participating in the demonstration. Lime Rock Park will not permit or conduct any activities on its property that will generate excessive amounts of smoke. Excessive smoke is defined as any smoke cloud produced by tire spin or engine exhaust that remains suspended in the air for more than 15 seconds, or that is visible above the tree line.

- IX. LRP will install, maintain and monitor decibel meters at the property line at Lime Rock Road and at White Hollow Road. Readings of muffled track activity will be monitored in real time by Lime Rock Park staff and LRP will adjust the activities on the track to reduce readings should they exceed 78 decibels in accordance with State of Connecticut regulations § 14-80a. LRP will make meter reading data available to LRCC or its designated agent upon request. LRP will provide decibel meter data to an LRCC designated representative on a monthly basis.
- X. “Major Racing Events” are any muffled or unmuffled racing activity with an expected attendance of 500 or more spectators in a single day of the event. Major Racing Events shall be limited to no more than 6 (six) in a calendar year and no more than one per month. LRP will provide notice of the 6 (six) Major Racing Events to a designated LRCC representative by March 1 of the calendar year.
- XI. “Major Sunday Events” are defined as (a) any for profit vendor-sponsored non-racing event directly related to motorsports with an attendance of more than 100 attendees and (b) any not for profit organization-sponsored fundraising event with an anticipated attendance of more than 100 attendees.
 - 1. Major Sunday Events are permitted only between the hours of 9:30 and 1:30 and shall be limited to 5 (five) per year and no more than one per month.
 - 2. Major Sunday Fundraising Events are permitted only between the hours of 9:00 and 5:00 and shall be limited to 6 (six) per year and no more than one per month.
- XII. For all Major Sunday Events LRP will provide the following control measures:
 - 1. A uniformed police officer on White Hollow Road and Route 112 from at least two hours before and two hours after the event’s scheduled run-time.
 - 2. Two manned LRP track vehicles with strobe lights, one in the LRP track entrance office driveway on route 112 and one at the intersection of White Hollow Road and Route 112 and personnel with yellow flags to help control traffic and noise.
 - 3. Orange cones placed on the median of White Hollow Road to slow ingress and egress of traffic
 - 4. Sandwich board signage including large quiet zone and speed restriction signage will be clearly visible on White Hollow Road and Rte. 112. Sandwich Board signage to be mutually agreed prior to installation.

- XIII. Lime Rock Park II, LLC will provide to LRCC, by email to members of the LRCC steering committee and US mail to LRCC, P.O. Box 525 Lakeville, CT 06039, its intended schedule of racing and events for the following calendar year no later than March 1 of each year. In addition, Lime Rock Park LLC will provide to the LRCC by email 14 days notice prior to filing or submission of any application to the Salisbury Planning and Zoning Commission for a Permit relating to any Major Racing Event or Major Sunday Event.
- XIV. This Amended Stipulation will be recorded in the Town of Salisbury Land records as a Notice filed in accordance with Connecticut General Statutes § 47-12, in addition to Superior Court files and Town of Salisbury Zoning Regulations.
- XV. This Amended Stipulation shall govern Lime Rock Park beginning with racing activity and events occurring in 2026.

LIME ROCK CITIZENS COUNCIL, LLC

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LIME ROCK PARK II, LLC

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Its Attorneys

CERTIFICATION

I hereby certify that the foregoing document was sent via electronic delivery this 3rd day of March 2026, to all parties listed below, and written consent for electronic delivery has been received from all parties.

John P. Tesei
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Greenwich, CT 06830

/s/ Timothy S. Hollister
Timothy S. Hollister
Commissioner of the Superior Court

Notice of Court Hearing

To All Interested Parties:

By order of the Superior Court for the Judicial District of Litchfield, notice is hereby given that Lime Rock Park II, LLC and the Lime Rock Citizens Council, LLC have filed a Motion to be Substituted as Parties and a Motion to Modify Stipulation and Injunction in the action originally titled *Ann Adams et al. v. B. Franklin Vaill et al*, Docket No. LLI-CV-58-0015459-S, which injunction was last modified in March 1988.

The Motion to Modify seeks to modify the terms of a permanent injunction entered into concerning the Lime Rock Park automobile race track in Salisbury, Connecticut. A copy of each motion, the 1988 modification and the proposed 2026 modification can be found on the Connecticut Judicial Branch website at [Case Detail - LLI-CV58-0015459-S](#). The Motions are also on file at the Clerk's office for the Superior Court for the Judicial District of Litchfield at Torrington, 50 Field Street under Docket No. LLI-CV-58-0015459-S.

A hearing on the Motion to Substitute Parties and the Motion to Modify the Stipulation will be held at the Superior Court for the Judicial District of Litchfield at Torrington, 50 Field Street, Torrington, Connecticut, on May 12, 2026 at 2:00pm. Any person who wishes to be heard regarding either Motion may attend and speak.

Summary of Changes to 1988 Stipulation Agreement:

Overall, the key points of the changes to the Stipulation are:

- Sunday racing remains prohibited.
- Muffled racing may occur on Monday through and including Saturday, from 9 am to 6pm, not 10 pm.
- Overnight racing, previously allowed up to 5 times a year, is eliminated.
- Unmuffled racing on Tuesday, which has been allowed from 12 noon to 6 pm, is now limited to 23 times a year.
- Unmuffled racing on Saturdays is unchanged: 10 times per year, from 9 am to 6 pm; and on the 10 Fridays that proceed the 10 Saturdays from 9 am to 6 pm.
- Unmuffled racing on Thursdays is allowed three times a year as the start of a three-day racing event occurring Thursday-Friday-Saturday, from 9 am to 6 pm; provided that (a) no Tuesday racing will occur; and (b) no Monday racing following a three-day race.
- Drifting demonstration is allowed on scheduled unmuffled racing days, no more than once per year on two consecutive days, with no more than three demonstrations per day, not more than fifteen minutes each. Participating cars limited to ten.
- Track loudspeakers may be used as before from 8 am to 7 pm, but prior to 9am or after 6pm must be limited to inward facing paddock areas.
- LRP will monitor and limit decibel levels at Lime Rock Road and White Hollow Road and may not exceed 78 decibels for muffled racing days.
- Motorcycle racing remains prohibited.
- Sunday events are limited to six fundraising events per year, 9 am to 5 pm, and limited to five “motorsports” (non -racing) events, 9:30 to 1:30.
- LRP will provide specific traffic control measures for all major racing events, all three-day events and Sunday events.
- Enforcement provisions have been added to the Stipulation.

221.1 Track for Racing Motor Vehicles

A track for racing motor vehicles, excluding motorcycles, as well as for automotive education and research in safety and for performance testing of a scientific nature, private auto and motorcycle club events, car shows, and certain other events identified in Section 221.2 are permitted subject to the issuance of a special permit in compliance with the procedures and standards of these regulations and also subject to the following:

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a. No motor vehicle races shall be conducted on any such track except in accordance with the following parameters¹:

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(1) All activity of muffled or unmuffled racing cars upon the asphalt track or in the paddock areas shall be prohibited on Sundays.

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(2) Activity with muffled racing car engines shall be permitted as follows:

A. On any ~~Monday through including Saturday~~ ~~weekday~~ between 9:00 a.m. and 10:00 p.m. ~~provided, however, that such activity may continue beyond the hour of 10:00 p.m. without limitation on not more than six (6) occasions during any one calendar year.~~

B. Permissible mufflers are those which meet the standards set forth in Section 14-80(c) of the General Statutes of Connecticut, Revision of 1959, or as the same may be amended from time to time.

(3) Activity with unmuffled racing car engines shall be permitted as follows:

A. On Tuesday afternoon, ~~not more than twenty-three (23) days in a calendar year, of each week~~ between 12:00 noon and 6:00 p.m.

B. On Saturdays, not more than ten (10) in number in each calendar year, between the hours of 9:00 a.m. and 6:00 p.m.

C. On the ten (10) Fridays which precede the said ten (10) Saturdays between the hours of ~~10:00~~ 9:00 a.m. and 6:00 p.m. ~~for the purpose of testing, qualifying or performing such other activities as may be necessary or incidental to the direct preparation for races on the Saturdays specified, provided that no qualifying heats or races shall be permitted on such Fridays.~~

¹ The parameters set forth herein are identical to those set forth in the Amended Stipulation of Judgment entered by the Court, Dranginis, J., on March 21, 1988 in the civil action, Ann Adams, et al. v. B. Franklin Vaill, et al., CV No. 15,459 (Judicial District of Litchfield at Litchfield), which parameters were previously incorporated by reference in the zoning regulations. A revised Stipulation was approved by an order of the Superior Court, Judicial District of Litchfield, dated _____, 2026 the revised Stipulation is hereby incorporated.

D. On three (3) Thursdays per year, as part of a scheduled unmuffled weekend racing, between 9:00 a.m. and 6:00 p.m.

E. There will be no unmuffled racing on the Monday and Tuesday preceding the three weeks in which Thursday to Saturday racing is scheduled.

F. ~~D~~ In such event the scheduled racing for activity for any of the said ten (10) Saturdays must be rescheduled for a "rain date", then the said "rain date" and the Friday preceding it shall not be considered as one of the ten (10) days referred to in Paragraphs b) and c) above.

G. ~~E.~~ On Memorial Day, Fourth of July and Labor Day between the hours of 9:00 a.m. and 6:00 p.m.

(i) In the event any of said holidays falls on a Tuesday, Thursday or a Friday, there may be unmuffled activity on the day preceding the holiday between the hours of 12:00 noon and 6:00 p.m., but in ~~the~~such event the permissible unmuffled activity of the next Tuesday ~~next~~ preceding any of the said~~the~~ holidays, as allowed by Section 3A shall be forfeited.

(ii) In the event any of said holidays falls on a Sunday, the next day (Monday) will be considered the holiday for these purposes.

~~(iii) In no event shall any such holidays increase the number of Saturdays of permissible unmuffled activity beyond ten (10) as provided in Paragraph b) above.~~

(4) Prohibited activity upon the track property shall include the revving or testing of muffled or unmuffled car engines on Saturdays and permitted holidays referenced in Sections 3G, prior to 9:00 a.m. and after 6:00 p.m., excepting the transportation of said vehicles to and from the paddock areas on or off their respective trailers, which transporting, unloading or loading shall not commence before 7:30 a.m. or extend beyond 7:30 p.m.

(5) The use of the track loudspeakers before 8:00 a.m. and after 7:00 p.m. is prohibited. Prior to 9:00 a.m. or after 6:00 p.m., including on all Sundays, the loudspeakers will be used in the inward-facing paddock facing areas only, and if needed, for emergency announcements.

(6) A "racing car", for purposes of this subsection, is defined as any car entered in an event on an asphalt track.

(7) Racing of motorcycles is prohibited. Nevertheless, specifically permitted are non-racing motorcycle activities including but not limited to demonstrations, instruction, timing, testing, practice and photography.

b. Stand-alone "Drifting" events are prohibited. Under the following conditions, drifting demonstrations are permitted: such demonstrations will be held only on scheduled unmuffled days and no more than once per year on two consecutive days; there will be no more than three demonstration sessions on each day of not more than 15 minutes each; at no time will there be more than 10 cars on track participating in the demonstration. Lime Rock Park will not permit or conduct any activities on its property that will generate excessive amounts of smoke. Excessive smoke is defined as any smoke cloud produced by tire spin or engine exhaust that remains suspended in the air for more than 15 seconds, or that is visible above the tree line.

c. Lime Rock Park will install, maintain and monitor decibel meters at the property line at Lime Rock Road and at White Hollow Road. Readings of muffled track activity will be monitored in real time by Lime Rock Park staff and Lime Rock Park will adjust the activities on the track to reduce readings should they exceed 78 decibels in accordance with State of Connecticut regulations, Section 14-80a. Lime Rock Park will make meter reading data available to the Lime Rock Citizens Council (LRCC) or its designated representative upon request. LRP will provide decibel meter data to an LRCC designated representative on a monthly basis.

d. Major Racing Events are any muffled or unmuffled racing activity with an expected attendance of 500 or more spectators in a single day of the event. Major Racing Events shall be limited to no more than 6 (six) in a calendar year and no more than one per month. LRP will provide notice of the 6 (six) Major Racing Events to a designated LRCC representative by March 1 of the calendar year.

e. Major Sunday Events shall be defined as (a) any for profit vendor-sponsored event directly related to motor sport activity with an attendance of more than 100 attendees ("Sunday Motorsports Event"); and (b) any not for profit organization-sponsored fundraising event with an anticipated attendance of more than 100 attendees.

1. Major Sunday Events are permitted only between the hours of 9:30 and 1:30 and shall be limited to 5 (five) per year and no more than one per month.

2. Major Sunday Fundraising Events are permitted only between the hours of 9:00 and 5:00 and shall be limited to 6 (six) per year and no more than one per month.

f. For all Major Sunday Events, LRP will provide the following control measures:

1. A uniformed police officer on White Hollow Road and Route 112 from at least two hours before and until two hours after the event's scheduled run-time.

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- 2. Two manned LRP track vehicles with strobe lights, one in the LRP track entrance office driveway on route 112 and one at the intersection of White Hollow Road and Route 112 and personnel with yellow flags to help control traffic and noise.
- 3. Orange cones placed on the median of White Hollow Road to slow ingress and egress of traffic.
- 4. Sandwich board signage including large quiet zone and speed restriction signage will be clearly visible on White Hollow Road and Rte. 112. Sandwich Board signage to be mutually agreed prior to installation.

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g. Lime Rock Park II, LLC will provide to LRCC, by email to members of the LRCC steering committee and US mail to LRCC, P.O. Box 525 Lakeville, CT 06039, its intended schedule of racing and events for the following calendar year no later than March 1 of each year. In addition, Lime Rock Park LLC will provide to the LRCC by email 14 days notice prior to filing or submission of any application to the Salisbury Planning and Zoning Commission for a Permit relating to any Major Racing Event of Major Sunday Event.

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h. This Amended Stipulation will be recorded in the Town of Salisbury Land records as a Notice filed in accordance with the Connecticut General Statured Section 47-12, in addition the Superior Court files and Town of Salisbury Zoning Regulations.

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~~b.~~ This Amended Stipulation shall govern Lime Rock Park beginning with racing activity and events occurring in 2026.

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~~j.~~ ~~b.~~ Where the land on which a race track is situated abuts or faces a residential zone district, there shall be a minimum of fifty-foot buffer strips along each yard, or part thereof, so abutting or facing, which shall contain a screen of shrubbery not less than fifteen feet in width nor less than six feet in height within one year of the adoption of this amendment to the regulations. This screen shall thereafter be suitably and neatly maintained by the owner, tenant and/or their agent. Any such screen shall consist of at least fifty percent evergreens so as to maintain a dense screen at all seasons of the year.

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ke. The lot shall have adequate frontage on or access to a principal traffic street or street capable of handling the volume of traffic to be generated thereon. The access and service roads connecting with the principal traffic street or streets shall be so located and designed as to avoid unsafe traffic conditions or congestion. Traffic control devices and lighting of access points at or across street or access intersections shall be provided at the expense of the owner when required and provision shall be made for safe pedestrian traffic to, from and within the lot. The design and location of access and

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intersections with public highways shall be subject to the approval of the Selectmen for a town road or the Connecticut Department of Transportation for a state highway.

d. Adequate off-street parking shall be provided to accommodate the vehicles of employees, proprietors, participants, customers, visitors and others.

e. Not more than three signs, not more than 50 square feet each, advertising the use of the premises shall be permitted. Any sign not consistently visible from off the premises is permitted. Directional signs, not more than six square feet each, are permitted.

f. No sign, with the exception of scoreboards, visible off the premises shall be illuminated by exposed tubes or other exposed light sources, nor shall any flashing sign be visible from off the premises. Spot or other lighting of any sign, building, structure, land track, parking space or any other part of the premises shall be so arranged that the light source is not visible from any point off the premises.

221.2 Accessory Uses to a Track for Racing Motor Vehicles

Accessory Uses to a track for racing motor vehicles may include: retail stores, professional or business offices, fire or emergency services, ATMs, restaurants, and food stands. Accessory uses may also include the use of the premises for automobile shows, sale of motor vehicles during racing events, sale of automotive parts and accessories; car washes, auto service and repairs; filling stations; commercial parking; laundry; equipment storage; racing schools and clubs; indoor theaters; and other similar activities that are accessory to the operation of a recreational race track herein permitted. Other accessory uses may include the production, showing, or performance of television, motion picture or radio programs with their related lighting and sound equipment.

221.3 Camping by spectators and participants is allowed as an accessory use to permissible automobile racing events subject to the following restrictions:

- a. All camping and camping vehicles shall be limited to locations within the infield of any asphalt race track existing as of the effective date of this regulation.
- b. No motor vehicles shall be parked in any Race Track outfield during the hours of 10:00 p.m. to 6:00 a.m. except those which are (1) on official track business; and (2) parked in the parking lot existing as of the effective date of this regulation.
- c. No traffic other than emergency or service vehicles shall be allowed between the hours of 11:00 pm and 6:00 am on any accessway into any race track that abuts property located at 52 White Hollow Road.

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221.4 The following uses are deemed not to be accessory uses to a track for racing motor vehicles but are allowed subject to a special permit: fireworks displays (with the exception of a single evening display during the annual Independence Day period in early July for charitable purposes), concerts, flea markets, craft fairs, food shows, non-automotive trade shows, and garden shows.

221.5 If the holder of a special permit for a track for motor vehicle racing leases or otherwise authorizes a private organization to use all or part of its property to a third party, it shall require said party to comply with all provisions of these regulations, the special permit, and its conditions.

Lime Rock Citizens Council
PO Box 525
Lakeville, CT 06039

March 31, 2026

Lime Rock Park II LLC, (LRP)

This letter is to confirm that we, the Steering Committee of the Lime Rock Citizens Council (LRCC), with the approval of our membership, approve the Regulation Request.

We have worked together with LRP for several years to update the existing 1988 Stipulation, and the proposed Amended Stipulation is our mutual result.

Thank you.

Peter Wolf, Rick Mulkames, Victor Germack, Sarah Wolf,
Douglas Howes

A handwritten signature in black ink that reads "Douglas Howes". The signature is written in a cursive style with a large, looped 'D' and a long, sweeping tail.