

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 16-cv-02002-WJM-KLM

OPEN STUDIOS, INC., a Colorado nonprofit corporation,

Plaintiff,

v.

BOULDER METALSMITHING ASSOCIATION,

Defendant.

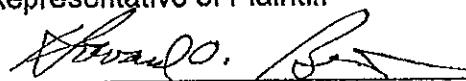
DRAFT SETTLEMENT AGREEMENT

1. The parties agree to release all claims that were or could have been brought, whether known or unknown, against each other in this lawsuit.
2. This settlement is a compromise of disputed claims. No party admits any liability to the other party. The parties agree not to disparage each other.
3. Defendant agrees to only use the phrase "open studio" in digital and print media and/or advertising to indicate that its metalsmithing art studio is open to the public and/or various artists for any reason (e.g., learning, practicing, creating, displaying and/or studying art.). Defendant further agrees not to use the phrase "open studio" to denote an event or program. *(no capital letters) TB Mc EA KQ*
4. The parties will bear their own costs and attorneys' fees.
5. Defendant's counsel will take the lead in drafting a Final Settlement Agreement, and counsel for Plaintiff will cooperate, and will assist in preparing a Stipulation of Dismissal with Prejudice to be filed within 20 days after execution of the Final Settlement Agreement.


AGREED on this 13th day of October, 2016:




Representative of Plaintiff



Counsel for Plaintiff



Representative of Defendant



Counsel for Defendant

