

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

Jill and Ron Ryan, et al.,	:	
individually and on behalf of others	:	
similarly situated,	:	
	:	
Plaintiffs,	:	No. 2:06-CV-0146 (WCO)
	:	
vs.	:	
	:	
Hidden Lake Academy, Inc., et al.,	:	
	:	
Defendants.	:	

**DEFENDANTS' MEMORANDUM IN SUPPORT
OF SETTLEMENT CLASS REPRESENTATIVES' MOTION FOR
FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Come now defendants Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato and submit this Memorandum in Support of Settlement Class Representatives' Motion for Final Approval of Class Action Settlement.

This Court is well aware of the procedural history of this action which was initiated by plaintiffs on September 11, 2006. At the hearing conducted on January 31, 2007, concerning the multiple motions filed by the parties, counsel for the defendants informed the Court of the significant deleterious effects the suit had had upon Hidden Lake Academy, the

therapeutic school for troubled teenagers. Subsequent to that hearing and partly as a consequence of this Court's rulings on the motions argued at the January 31, 2007, hearing, the parties participated in lengthy and substantial settlement negotiations. These negotiations were undertaken and conducted throughout at arms-length. Although defendants did and do contest the allegations made regarding them, defendants request that this Court grant the Settlement Class Representatives' Motion for Final Approval of Class Settlement.

Pursuant to Paragraph 12 of the parties' Stipulation and Agreement of Settlement, dated December 13, 2007, and in accordance with 28 USC §1715, defendants sent to the attorneys general of each state in which a potential class member was believed to have resided, via letter dated December 21, 2007, the notice of settlement along with a compact disk containing the following documents:

- 1) copies of the original complaint, the first amended complaint and the second amended complaint in this civil action;
- 2) a copy of the parties' Stipulation and Agreement of Settlement; and
- 4) copies of four Orders issued by this Court regarding this civil action.

These documents were sent to the Attorneys General of Alabama, Arizona, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, New Hampshire, New Jersey, New York, North Carolina, Ohio, Oklahoma, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Vermont, Virginia and Wisconsin as well as the Attorney General of the United States of America. Counsel for defendants only received two responses to these letters and accompanying material. A representative of the Attorney General of Delaware made a telephone call and inquired if any resident of Delaware had been referred to Hidden Lake Academy by any agency of the State of Delaware. The Attorney General of Oklahoma wrote a letter in which he acknowledged that he had received the notice and had referred the notice to a staff member for review. No additional communication has been made by the Office of the Attorney General of Delaware or the Office of the Attorney General of Oklahoma. Attached hereto as Exhibit A are copies of the above-described letters.

Defendants and their counsel have not received any notice by any potential class member of any objection to the proposed settlement.

Defendants did receive the May 3, 2008, letter of Ms. Carol Collins in which she praised Dr. Buccellato and the efforts of the staff of Hidden Lake Academy. Defendants are aware of the opt-outs submitted by parents of seventeen children who attended Hidden Lake Academy. Two sets of parents sent separate letters announcing their individual decisions to opt out of the class settlement. The parents of two other children sent letters expressing their decisions to opt out of the settlement, stating that “[w]e do not agree with the plaintiffs’ claims” (Aileen and Todd Blakely) and “[w]e are more than satisfied with the care, education and therapy that our son received during his stay at HLA” (Deborah and J. A. Bouknight).

Federal courts have consistently recognized an overriding public policy in favor of settlements, particularly the settlement of complex class actions. *Cotton v. Hinton*, 559 F.2d 1326, 1331 (5th Cir. 1977); *In re Domestic Air Transportation Antitrust Litigation*, 148 F.R.D. 1097, 305 (N.D. Ga. 1993). Federal courts have also recognized that one of the principal inducements for a party to settle a class action is the opportunity to realize substantial savings by compromising disputed claims. *In re General Motors Pick-Up Truck Fuel Tank Products Liability Litigation*, 55 F.3d 768, 790 (3rd Cir. 1995). Similarly, federal courts have recognized that class settlements are based upon the settling parties’ assessment of

litigation risks. *See General Motors Pick-Up Truck*, 55 F.3d at 790-91.

In their motion and accompanying papers seeking final approval of the parties' settlement agreement, the Settlement Class Representatives examined all of the pertinent Rule 23 requirements and showed this Court how the proposed settlement class meets those standards. Defendants support final approval of the proposed class action settlement. Among other benefits, the parties' settlement will give defendants a release by class members of all claims asserted.

For the foregoing reasons, defendants request that the parties' settlement be approved.

This 22nd day of August, 2008.

/s/ Robert A. Barnaby II
Robert A. Barnaby II
rbarnaby@dhnc-law.com
(Georgia Bar No. 038525)
Counsel for Defendants

Donahue, Hoey, Nelson & Cohen, LLC
1050 Crown Pointe Parkway
Suite 1600
Atlanta, GA 30338
770-391-1300 (office)
770-391-1320 (facsimile)

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

Jill and Ron Ryan, et al., :
individually and on behalf of others :
similarly situated, :
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 Plaintiffs, : No. 2:06-CV-0146 (WCO)
 :
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 vs. :
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 :
 :
 Hidden Lake Academy, Inc., et al., :
 :
 :
 :
 Defendants. :

CERTIFICATION

Counsel for defendants hereby certifies that the text of this document has been prepared with Times New Roman 14 point, one of the fonts and point selections approved by the Court, and complies in all respects with Local Rule 5.1(C) of the United States District Court, Northern District of Georgia.

This 22nd day of August, 2008.

/s/ Robert A. Barnaby II
Robert A. Barnaby II
rbarnaby@dhnc-law.com
(Georgia Bar No. 038525)
Counsel for Defendants

Donahue, Hoey, Nelson & Cohen, LLC
1050 Crown Pointe Parkway
Suite 1600
Atlanta, GA 30338
770-391-1300 (office)
770-391-1320 (facsimile)

EXHIBIT A



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

January 7, 2008

Mr. Robert A. Barnaby II
Donahue, Hoey, Nelson & Cohen, LLC
1050 Crown Pointe Parkway, Suite 1600
Atlanta, GA 30338

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Barnaby:

Thank you for your letter regarding the above. I have referred this information to Jane Wheeler, Director of the Consumer Protection Unit, for her review and any appropriate action or response.

I appreciate you bringing this to our attention. If you have any questions, please feel free to contact Ms. Wheeler directly.

Sincerely,

A handwritten signature in black ink, appearing to read "W.A. Edmondson".

W.A. DREW EDMONDSON
ATTORNEY GENERAL

WAE:st

cc: Jane Wheeler-

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
1050 CROWN POINTE PARKWAY
SUITE 1600
ATLANTA, GEORGIA 30338
PHONE (770) 391-1300
FAX (770) 391-1320
WEB www.dhnc-law.com

KENNETH B. DONAHUE
CHARLES G. HOEY
DANA F. NELSON
DANIEL E. COHEN

TRACI D. TEER
WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Michael B. Mukasey
Attorney General of the United States of America
950 Pennsylvania Avenue, NW
Washington, D.C. 20503-0001

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Mukasey:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

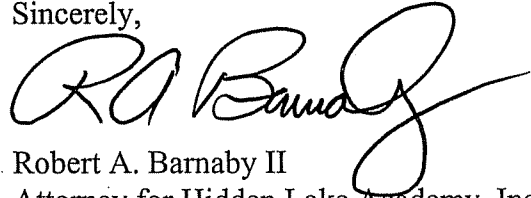
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- 1) copies of the original complaint, the first amended complaint and the second amended complaint;
- 2) a copy of the proposed notice to potential class members which contains a notice of the members' right to request exclusion from the action;
- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that there are approximately 750 potential class members. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R.A. Barnaby II". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
1050 CROWN POINTE PARKWAY
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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Troy King
Attorney General
State of Alabama
Alabama State House
11 South Union Street,
Third Floor
Montgomery, AL 36130

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. King:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

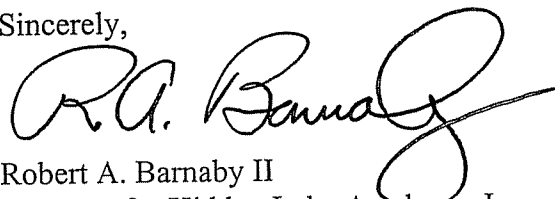
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 10 potential class members reside in Alabama. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R.A. Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Terry Goddard
Attorney General
State of Arizona
1275 West Washington Street
Phoenix, AZ 85007

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Goddard:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

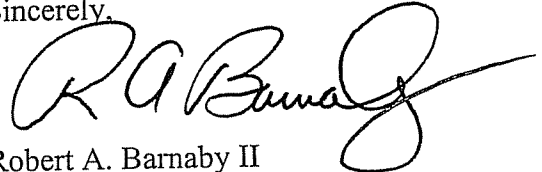
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 1 potential class member resides in Arizona. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
1050 CROWN POINTE PARKWAY
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ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Edmund G. Brown, Jr.
Attorney General
State of California
1300 I Street
#1120
Sacramento, CA 95814-2919

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Brown:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

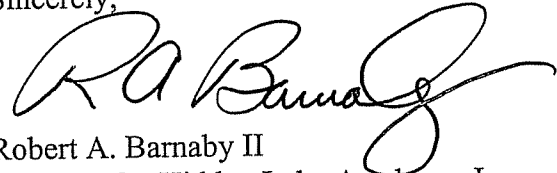
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 21 potential class members reside in California. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable John W. Suthers
Attorney General
State of Colorado
1525 Sherman Street,
5th Floor
Denver, Colorado 80203

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Suthers:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

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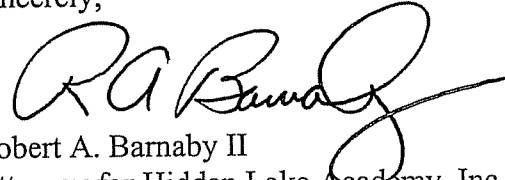
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement

of this civil action.

The defendants estimate that 14 potential class members reside in Colorado. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R.A. Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
1050 CROWN POINTE PARKWAY
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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Richard Blumenthal
Attorney General
State of Connecticut
55 Elm Street
Hartford, CT 06106

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Blumenthal:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

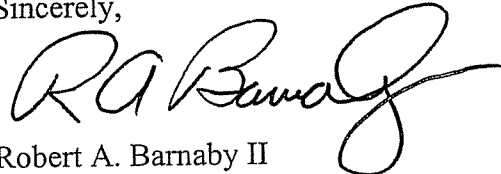
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 23 potential class members reside in Connecticut. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

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Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
1050 CROWN POINTE PARKWAY
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WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Joseph R. Biden III
Attorney General
State of Delaware
820 N. French Street
Wilmington, DE 19801

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Biden:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

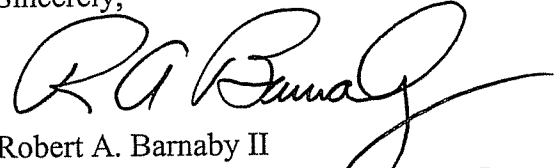
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 3 potential class members reside in Delaware. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
1050 CROWN POINTE PARKWAY
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WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Peter Nickels
Attorney General
State of District of Columbia
441 4th Street, NW
Suite 1060 N
Washington, DC 20001

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Nickels:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

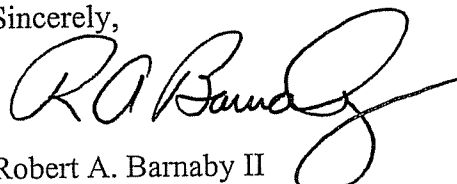
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- 3) a copy of the parties' stipulation of settlement; and
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No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 6 potential class members reside in the District of Columbia. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a large, looping initial "R".

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
1050 CROWN POINTE PARKWAY
SUITE 1600
ATLANTA, GEORGIA 30338
PHONE (770) 391-1300
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KENNETH B. DONAHUE
CHARLES G. HOEY
DANA F. NELSON
DANIEL E. COHEN

TRACI D. TEER
WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable William McCollum
Attorney General
State of Florida
The Capitol PL-01
Tallahassee, Fl 32399-1050

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. McCollum:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

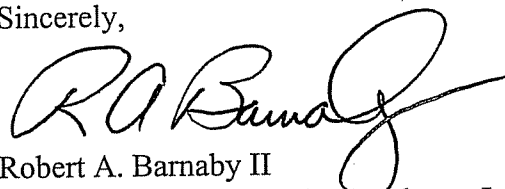
Enclosed is a compact disk containing copies of the following documents, as required by 28 USC 1715 (b):

- 1) copies of the original complaint, the first amended complaint and the second amended complaint;
- 2) a copy of the proposed notice to potential class members which contains a notice of the members' right to request exclusion from the action;
- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 93 potential class members reside in Florida. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,



Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Thurbert E. Baker
Attorney General
State of Georgia
40 Capitol Square, SW
Atlanta, GA 30334-1300

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Baker:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

Enclosed is a compact disk containing copies of the following documents, as required by 28 USC 1715 (b):

- 1) copies of the original complaint, the first amended complaint and the second amended complaint;
- 2) a copy of the proposed notice to potential class members which contains a notice of the members' right to request exclusion from the action;
- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 56 potential class members reside in Georgia. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a large loop at the end.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
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WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Lisa Madigan
Attorney General
State of Illinois
500 South Second Street
Springfield, IL 62706

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Ms. Madigan:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

Enclosed is a compact disk containing copies of the following documents, as required by 28 USC 1715 (b):

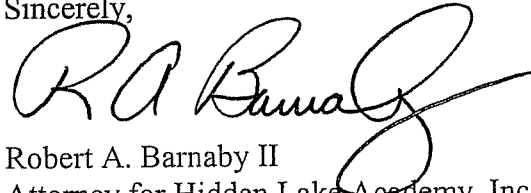
- 1) copies of the original complaint, the first amended complaint and the second amended complaint;
- 2) a copy of the proposed notice to potential class members which contains a notice of the members' right to request exclusion from the action;
- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement

of this civil action.

The defendants estimate that 26 potential class members reside in Illinois. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
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WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Steve Carter
Attorney General
State of Indianapolis
402 West Washington Street
Indianapolis, IN 46204

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Carter:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

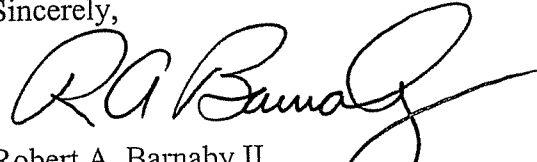
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- 1) copies of the original complaint, the first amended complaint and the second amended complaint;
- 2) a copy of the proposed notice to potential class members which contains a notice of the members' right to request exclusion from the action;
- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 5 potential class members reside in Indiana. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
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1050 CROWN POINTE PARKWAY
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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Tom Miller
Attorney General
State of Iowa
1305 E. Walnut Street
Des Moines IA 50319

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Miller:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

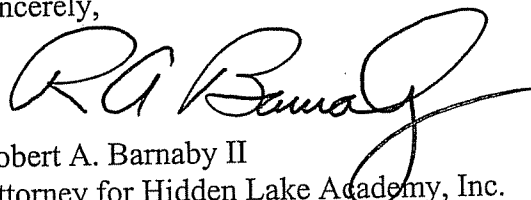
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- 1) copies of the original complaint, the first amended complaint and the second amended complaint;
- 2) a copy of the proposed notice to potential class members which contains a notice of the members' right to request exclusion from the action;
- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 3 potential class members reside in Iowa. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Paul J. Morrison
Attorney General
State of Kansas
2nd Floor
120 S.W. 10th
Topeka, KS 66612-1597

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Morrison:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

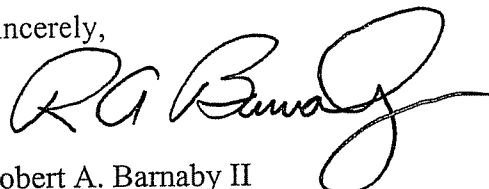
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 1 potential class member resides in Kansas. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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1050 CROWN POINTE PARKWAY
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ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Gregory D. Stumbo
Attorney General
State of Kentucky
The Capitol, Suite 118
700 Capitol Avenue
Frankfort, Kentucky
40601-3449

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Stumbo:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

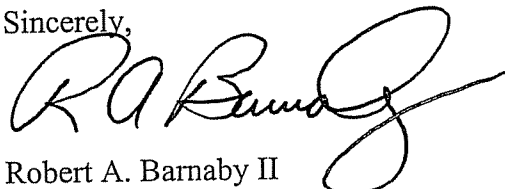
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 7 potential class members reside in Kentucky. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a large, looping initial "R" and "A".

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Charles C. Foti, Jr.
Attorney General
State of Louisiana
1885 North 3rd Street
6th Floor
Baton Rouge, LA 70802

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Foti:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

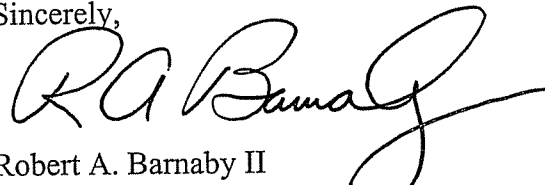
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 41 potential class members reside in Louisiana. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable G. Steven Rowe
Attorney General
State of Maine
State House Station 6
Augusta, Maine 04333-0006

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Rowe:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

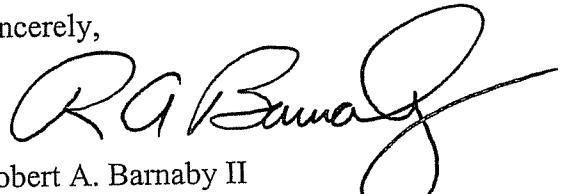
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 2 potential class members reside in Maine. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Douglas F. Gansler
Attorney General
State of Maryland
200 Saint Paul Place
16th Floor
Baltimore, MD 21202

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Gansler:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

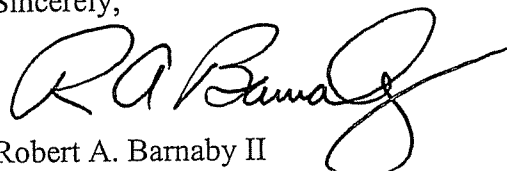
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 24 potential class members reside in Maryland. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R.A. Barnaby II". The signature is fluid and cursive, with a large, stylized initial "R" and "B".

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Martha Coakley
Attorney General
State of Massachusetts
One Ashburton Place
Boston, MA 02108

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Ms. Coakley:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

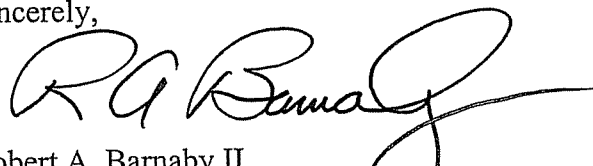
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- 1) copies of the original complaint, the first amended complaint and the second amended complaint;
- 2) a copy of the proposed notice to potential class members which contains a notice of the members' right to request exclusion from the action;
- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 35 potential class members reside in Massachusetts. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II", with a long horizontal flourish extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
1050 CROWN POINTE PARKWAY
SUITE 1600
ATLANTA, GEORGIA 30338
PHONE (770) 391-1300
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KENNETH B. DONAHUE
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TRACI D. TEER
WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Mike Cox
Attorney General
State of Michigan
P. O. Box 30212
525 West Ottawa Street
Lansing, MI 48909

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Cox:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

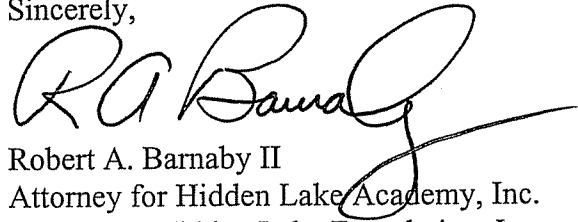
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 26 potential class members reside in Michigan. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Lori Swanson
Attorney General
State of Minnesota
State Capitol, Suite 102
St. Paul, MN 55155

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Ms. Swanson:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 3 potential class members reside in Minnesota. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Jim Head
Attorney General
State of Mississippi
P.O. Box 220
Jackson, Mississippi
37205-0220

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Head:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

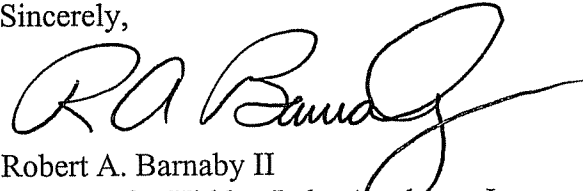
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 5 potential class members reside in Mississippi. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Jeremiah W. Nixon
Attorney General
State of Missouri
Supreme Court Building
PO Box 899
221 W. High Street
Jefferson City, MO 65101-1516

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Nixon:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

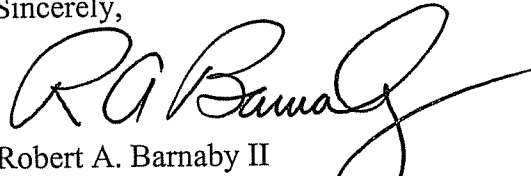
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 5 potential class members reside in Missouri. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Kelly A. Ayotte
Attorney General
State of New Hampshire
33 Capitol Street
Concord, NH 03301

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Ms. Ayotte:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

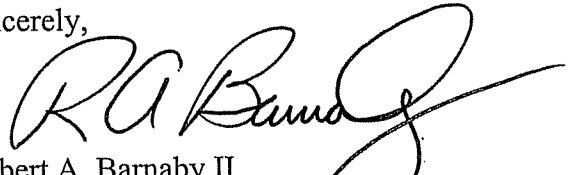
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 4 potential class members reside in New Hampshire. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Anne Milgram
Attorney General
State of New Jersey
25 Market Street
P.O. Box 080
Trenton, NJ 08625-0080

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Ms. Milgram:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

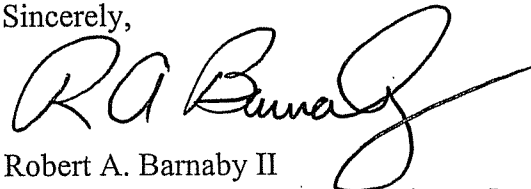
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 35 potential class members reside in New Jersey. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Andrew M. Cuomo
Attorney General
State of New York
120 Broadway
New York, NY 10271

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Cuomo:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

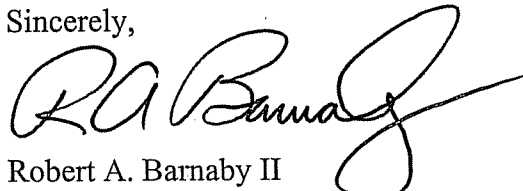
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- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 29 potential class members reside in New York. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Roy Cooper
Attorney General
State of North Carolina
9001 Mail Service Center
Raleigh, NC 27699-9001

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Cooper:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

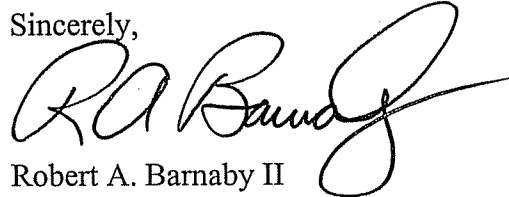
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 51 potential class members reside in North Carolina. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Marc Dann
Attorney General
State of Ohio
State Office Tower
30 E. Broad Street, 17th Floor
Columbus, OH 43215-3428

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Dann:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

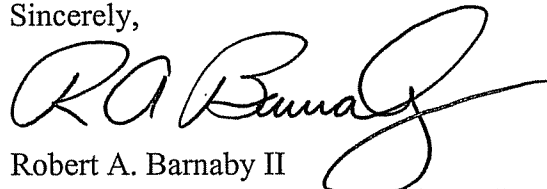
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 10 potential class members reside in Ohio. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
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Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable W. A. Drew Edmondson
Attorney General
State of Oklahoma
2300 N. Lincoln Blvd.
Suite 112
Oklahoma City, OK 73105

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Edmondson:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 2 potential class members reside in Oklahoma. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
1050 CROWN POINTE PARKWAY
SUITE 1600
ATLANTA, GEORGIA 30338
PHONE (770) 391-1300
FAX (770) 391-1320
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KENNETH B. DONAHUE
CHARLES G. HOEY
DANA F. NELSON
DANIEL E. COHEN

TRACI D. TEER
WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Tom Corbett
Attorney General
State of Pennsylvania
Strawberry Square
15th Floor
Harrisburg, PA 17120

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Corbett:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

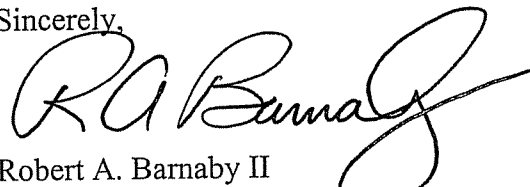
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- 1) copies of the original complaint, the first amended complaint and the second amended complaint;
- 2) a copy of the proposed notice to potential class members which contains a notice of the members' right to request exclusion from the action;
- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 23 potential class members reside in Pennsylvania. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a large loop at the end.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Patrick C. Lynch
Attorney General
State of Rhode Island
150 South Main Street
Providence, RI 02903

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Lynch:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

Enclosed is a compact disk containing copies of the following documents, as required by 28 USC 1715 (b):

- 1) copies of the original complaint, the first amended complaint and the second amended complaint;
- 2) a copy of the proposed notice to potential class members which contains a notice of the members' right to request exclusion from the action;
- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 1 potential class member resides in Rhode Island. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
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WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Henry McMaster
Attorney General
State of South Carolina
P. O. Box 11549
Columbia, SC 29211

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. McMaster:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

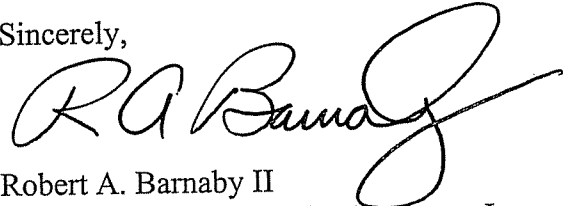
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- 2) a copy of the proposed notice to potential class members which contains a notice of the members' right to request exclusion from the action;
- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 19 potential class members reside in South Carolina. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a large loop at the end.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Larry Long
Attorney General
State of South Dakota
1302 E Hwy 14
Suite 1
Pierre, SD 57501-8501

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Long:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

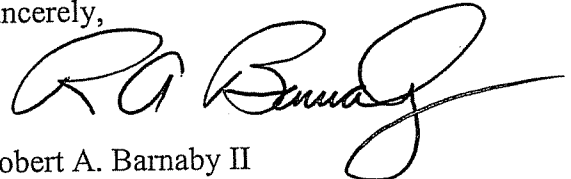
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 1 potential class member resides in South Dakota. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
1050 CROWN POINTE PARKWAY
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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Robert E. Cooper
Attorney General
State of Tennessee
P. O. Box 20207
Nashville, TN 37202-0207

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Cooper:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

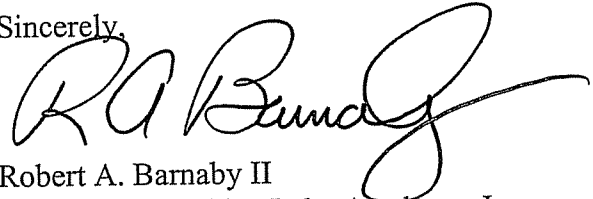
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 9 potential class members reside in Tennessee. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
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WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Greg Abbott
Attorney General
State of Texas
6th Floor
300 W. 15th Street
P.O. Box 12548
Austin, TX 78701-1649

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Abbott:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

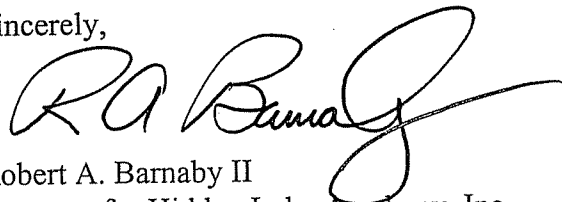
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 71 potential class members reside in Texas. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable William H. Sorrell
Attorney General
State of Vermont
109 State Street
Montpelier, VT 05609-1001

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Sorrell:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

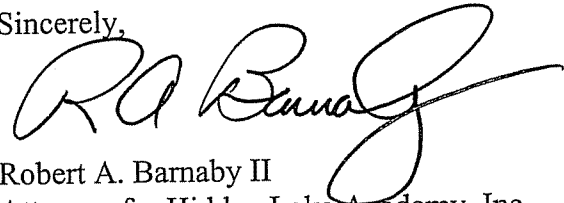
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 1 potential class member resides in Vermont. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert A. Barnaby II". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

DONAHUE, HOEY, NELSON & COHEN, LLC
ATTORNEYS AT LAW
1050 CROWN POINTE PARKWAY
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ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable Bob McDonnell
Attorney General
State of Virginia
900 East Main Street
Richmond, VA 23219

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. McDonnell:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

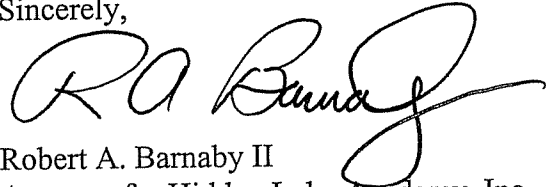
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- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 34 potential class members reside in Virginia. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

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WM. DANIEL FLOYD
ERICA C. MITCHELL

ROBERT A. BARNABY II
OF COUNSEL

December 21, 2007

Honorable J. B. Van Hollen
Attorney General
State of Wisconsin
114 East, State Capitol
P.O. Box 7857
Madison, WI 53707-7857

Re: Notice of Proposed Settlement of a Potential Class Action

Dear Mr. Van Hollen:

On behalf of Hidden Lake Academy, Inc., HLA, Inc., Hidden Lake Foundation, Inc. and Dr. Leonard Buccellato, I am providing to you the notice required by 28 U.S.C. 1715 and Rule 23(e)(2) of the Federal Rules of Civil Procedure that they are the four defendants in a certain civil action pending in the United States District Court for the Northern District of Georgia, styled as Jill Ryan, et al. v. Hidden Lake Academy, Inc., et al., Civil Action File No. 2:06-CV-0146 (WCO) and that on December 12, 2007, the plaintiffs and defendants filed with the Court a proposed settlement of a potential class action.

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- 2) a copy of the proposed notice to potential class members which contains a notice of the members' right to request exclusion from the action;
- 3) a copy of the parties' stipulation of settlement; and
- 4) copies of four Orders issued by Judge William O'Kelley regarding this civil action.

No other agreements have been made by the parties in connection with the proposed settlement of this civil action.

The defendants estimate that 5 potential class members reside in Wisconsin. Defendants cannot at this time estimate the proportionate share of each member of the entire settlement for the reason that any potential member's share will depend upon the amount of tuition paid by that individual.

Sincerely,

A handwritten signature in black ink, appearing to read "RA Barnaby II". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Barnaby II
Attorney for Hidden Lake Academy, Inc.
HLA, Inc., Hidden Lake Foundation, Inc.,
and Dr. Leonard Buccellato

RABII/lc
Enclosure

cc: Mr. Lawrence J. Lederer w/encl
Mr. Michael Gorby w/encl

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION

Jill and Ron Ryan, et al.,	:	
individually and on behalf of others	:	
similarly situated,	:	
	:	
Plaintiffs,	:	No. 2:06-CV-0146 (WCO)
	:	
vs.	:	
	:	
Hidden Lake Academy, Inc., et al.,	:	
	:	
Defendants.	:	

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for all parties in the foregoing matter with a copy of: **DEFENDANTS' MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT** with the Clerk of Court using CM/ECF system which will automatically send e-mail notification of such filing to the following counsel of record:

Merrill D. Davidoff, Esq.
mdavidoff@bm.net
Lawrence J. Lederer, Esq.
llederer@bm.net
Lane L. Vines, Esq.
lvines@bm.net
Jonathan Stanwood, Esq.
jstanwood@bm.net

(Admitted Pro Hac Vice)
David Anziska, Esq.
danzinska@bm.net

BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, Pennsylvania 19103
(215) 875-3000
(215) 875-4604

Michael J. Gorby, Esq.
mgorby@gorbypeters.com
(Georgia Bar No. 301950)
Mary Donne Peters, Esq.
mpeters@gorbypeters.com
(Georgia Bar No. 573595)

GORBY, PETERS & ASSOCIATES, P.C.
Two Ravinia Drive, Suite 1500
Atlanta, GA 30346-2104
(404) 239-1150
(404) 239-1179 Fax

This 22nd day of August, 2008.

/s/ Robert A. Barnaby II
Robert A. Barnaby II
rbarnaby@dhnc-law.com
(Georgia Bar No. 038525)
Donahue, Hoey, Nelson & Cohen, LLC
1050 Crown Pointe Parkway
Suite 1600
Atlanta, GA 30338
770-391-1300 (office)
770-391-1320 (facsimile)

COUNSEL FOR DEFENDANTS