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Transaction ID 76905176
Case No. N25A-08-006 DJB



EXHIBIT 4

IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

KATHY JENNINGS :
 :
 Plaintiff, :
 v. : C.A. No. 2021-0766-KSJM
 :
 :
 KEANDRA RAY, et al. :
 :
 Defendants. :

STIPULATION

Subject to the Court’s approval, the parties stipulate to the dismissal with prejudice of the above-captioned lawsuit based on the following:

1. Defendants Keandra Ray and Kristina Kelly (“Defendants”) shall refrain from protesting in the neighborhood of Deputy Attorney General Denney, or in the neighborhood where any member of his family resides.
2. With respect to any future residential public protests regarding justice for Lymond Moses, Defendants shall provide 24-hour advance notice to Robert Irwin, the Delaware Department of Justice Director of Special Investigations, via text message or email.
3. In the course of public protesting regarding justice for Lymond Moses, Defendants shall not intentionally chant or yell obscenities.
4. In the course of public protesting regarding justice for Lymond Moses, Defendants shall not make “true threats,” as defined in *Virginia v. Black*, 538 US 343 (2003).

5. In the course of public protesting regarding justice for Lymond Moses, Defendants shall not intentionally or knowingly video record any minor children other than their own.

6. In the course of public protesting regarding justice for Lymond Moses, protestors will not remain standing in front of any single home in a residential area, but, will walk through the neighborhood. Defendants shall be free to pass by any house as long as they do not remain there.

7. In the course of public protesting regarding justice for Lymond Moses, Defendants will comply with all applicable noise ordinances.

This action is DISMISSED with prejudice, with each side to bear their own fees and expenses.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

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IT IS SO ORDERED:

The Hon. Kathaleen St. Jude McCormick