

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MBOHO MKPARAWA IBIBIO USA INC, *et al*, §
§

Plaintiffs, §

VS. §

CIVIL ACTION NO. 4:12-CV-2363

SYLVANUS OKON, *et al*, §

Defendants. §

SETTLEMENT AGREEMENT

This Agreement is entered into as of April 14, 2016 by and between Plaintiffs Mboho Mkparawa Ibibio, *et al*, and Defendants Sylvanus Okon, *et al*, to settle and resolve the above-captioned litigation.

Defendants hereby recognize Mboho Mkparawa Ibibio's right to its unique Name, Logo, Motto, Anthem, Uniform, and traditions.

Plaintiffs hereby recognize the Defendants' significant contributions to the advancement of the Ibibio people in the United States. Mboho Mkparawa Ibibio further acknowledges Sylvanus Okon for his leadership and dedication to this cause.

Defendants shall within the next 30 days:

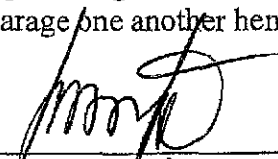
1. Relinquish the organization name Mboho Mkparawa Ibibio USA, Inc.
2. Relinquish the Logo, Motto, and Anthem of Mboho Mkparawa Ibibio
3. Cease to use the Mboho Mkparawa Ibibio uniform with the Logo
4. Cease to use the Mboho Mkparawa Ibibio name on its website
5. Return all assets of Mboho Mkparawa Ibibio including documents and other materials
6. Cease to call themselves officers of Mboho Mkparawa Ibibio
7. Dissolve the corporation Mboho Mkparawa Ibibio USA, Inc.
8. Defendants may continue as a separate organization with their own unique name, logo, motto, anthem, uniform, etc.

9. All former members who are willing may rejoin Mboho Mkparawa Ibibio


Each party will bear its own attorney's fees and costs in this action.

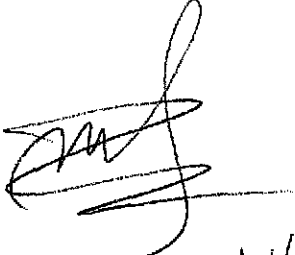
The parties agree that this is a full and final settlement of their dispute and further agree not to disparage one another henceforth.

Plaintiffs


April 14, 2016

Defendants




April 14, 2016