

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

_____)	
PUBLIC CITIZEN, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 18-1047 (CKK)
)	
UNITED STATES DEPARTMENT)	
OF EDUCATION,)	
)	
Defendant.)	
_____)	

JOINT STIPULATION OF SETTLEMENT

Plaintiff Public Citizen and defendant U.S. Department of Education (collectively, the “Parties”), by and through undersigned counsel, hereby stipulate and agree as follows:

1. The Parties do hereby agree to settle and compromise Plaintiff’s claim for attorneys’ fees and costs in this action.
2. Defendant shall pay to counsel for Plaintiff, Public Citizen Litigation Group, the sum of twenty thousand dollars (\$20,000.00) for attorneys’ fees and costs in this matter. Defendant will pay such attorneys’ fees and costs via an electronic transfer of funds to a bank account that plaintiff’s counsel will specify. Upon filing this Joint Stipulation, the Parties will promptly complete and transmit the documentation necessary to effectuate this payment.
3. Upon entry of this Joint Stipulation, Plaintiff’s motion for attorneys’ fees (ECF No. 30) shall be deemed withdrawn.
4. This Joint Stipulation shall constitute full and final settlement and satisfaction of all claims by plaintiff against defendant arising from the allegations set forth in the Complaint filed in this action, including claims for fees, costs, and expenses.

5. This Joint Stipulation shall not constitute an admission of liability or fault on the part of defendant or the United States or their agents, servants, or employees, and both Parties have entered into this Stipulation for the sole purpose of compromising disputed claims and avoiding the expenses and risks of further litigation.

6. The Parties agree that this Joint Stipulation will not be used as evidence or otherwise in any pending or future civil or administrative action against the U.S. Department of Education, the United States, or any agency or instrumentality of the United States.

Dated: August 1, 2019

/s/ Adam R. Pulver

Adam R. Pulver (D.C. Bar No. 1020475)
Patrick D. Llewellyn (D.C. Bar No. 1033296)
Public Citizen Litigation Group
1600 20th Street NW
Washington, DC 20009
(202) 588-1000
Apulver@citizen.org

Counsel for Plaintiff

Respectfully submitted,

JESSIE K. LIU
D.C. Bar 472845
United States Attorney

DANIEL F. VAN HORN
D.C. Bar 924092
Chief, Civil Division

By: /s/ Jason T. Cohen

JASON T. COHEN, ME Bar #004465
Assistant United States Attorney
555 Fourth Street, N.W.
Washington, D.C. 20530
(202) 252-2523
Jason.Cohen@usdoj.gov

Counsel for Defendant