

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

PUBLIC CITIZEN, INC.)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 18-1048 (RDM)
)	
U.S. DEPARTMENT OF HOMELAND)	
SECURITY, ET AL.)	
)	
Defendant.)	

STIPULATION OF SETTLEMENT AND DISMISSAL

This Stipulation of Settlement and Dismissal (Stipulation) is entered into between Plaintiff, Public Citizen, Inc. (Plaintiff) and Defendant, U.S. Dept. of Homeland Security (DHS or Defendant) and U.S. Citizenship and Immigration Services (USCIS or Defendant). The Parties, by and through their respective counsel, hereby stipulate and agree as follows:

RECITALS

1. Plaintiff filed this suit in the United States District Court for the District of Columbia pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, seeking release of certain information by the U.S. Dept. of Homeland Security (DHS) and U.S. Citizenship and Immigration Services (USCIS);
2. DHS and USCIS have produced to Plaintiff responsive documents in connection with its FOIA request;
3. Plaintiff has informed DHS and USCIS that it will not challenge any of their withholdings;
4. This Stipulation constitutes a full and final resolution of all claims and allegations arising from the above-captioned civil action.

STIPULATION

5. Plaintiff hereby dismisses with prejudice any and all claims asserted in this action under Federal Rule of Civil Procedure 41.

6. Defendant agrees to pay counsel for Plaintiff a lump sum of Three Thousand Dollars (\$3,000.00), which sum shall be in complete and full settlement and satisfaction of any and all claims, demands, rights, and causes of action of whatsoever kind and nature for attorneys' fees and costs incurred in connection with the above-captioned civil action.

7. Payment of the attorneys' fees and costs will be made by electronic transfer to counsel for Plaintiff, payable to Public Citizen Foundation. Plaintiff's counsel shall cooperate with defendant to insure that all documentation required to process this payment is complete and accurate. Payment shall be made as promptly as practicable, consistent with the normal processing procedures followed DHS and USCIS, following the filing of this Stipulation.

8. Plaintiff releases DHS, USCIS, and the United States and any department, agency, officer or employee of DHS, USCIS, and/or the United States from any and all claims, past or present that Plaintiff has alleged or could have alleged against DHS, USCIS, or the United States, arising out of Plaintiff's FOIA request at issue in this action.

9. This Stipulation shall not constitute an admission of liability or fault on the part of the United States, its agents, servants, or employees and is entered into by both parties for the sole purpose of compromising disputed claims and avoiding the expenses and risks of further litigation.

10. This Stipulation shall be binding upon and inure to the benefit of the parties hereto and their respective successors and assigns.

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

12. This Stipulation shall become effective only upon execution by all of the parties; however, this Stipulation may be executed by the parties in several counterparts and shall constitute one Stipulation. The parties further agree that a facsimile of the signatures of the parties and counsel will be the same as the original.

Respectfully submitted,

/s/Adam R. Pulver
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