IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

	)	
ELECTRONIC PRIVACY	)	
INFORMATION CENTER	)	
	)	
Plaintiff,	)	
v.	)	No. 1:12-02053 (ESH)
	)	
UNITED STATES CENTRAL	)	
INTELLIGENCE AGENCY	)	
	)	
Defendant.	)	
	)	

VOLUNTARY STIPULATION OF SETTLEMENT AND ORDER OF DISMISSAL

In this case brought under the Freedom of Information Act ("FOIA"), 5 U.S.C. §
552, it is hereby stipulated and agreed between plaintiff Electronic Privacy Information
Center ("Plaintiff") and defendant United States Central Intelligence Agency
("Defendant"), collectively referred to hereinafter as "the Parties," by and through their
respective attorneys, as follows:

1.   The Parties agree to settle and compromise this action under the terms and
conditions set forth herein.

2.   In consideration of Plaintiff's agreement that this action shall be dismissed
with prejudice, Defendant agrees to pay Plaintiff the total sum of $2750.00 in full
satisfaction of any and all claims by Plaintiff for attorneys' fees and costs in connection
with this case.

3.   By this Stipulation, Plaintiff waives, releases, discharges, and abandons
any and all claims, whether asserted or un-asserted, against Defendant in connection with
its FOIA request dated March 28, 2012.

4.   The undersigned counsel represent that they are authorized to make this agreement on behalf of their clients.

5.   Execution of this Stipulation of Settlement by Plaintiff's counsel and counsel for the Defendant shall constitute a dismissal of this action with prejudice, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.

6.   This Stipulation shall be binding upon and inure to the benefit of the Parties hereto and their respective successors and assignees.

7.   The Parties agree that a facsimile of the signatures of the parties and counsel will be the same as the original.

8.   The Court shall retain jurisdiction to enforce the terms of this Stipulation and to conduct such further proceedings and award relief as may be necessary to resolve any breach of this Agreement by either of the Parties.

9.   This Stipulation shall become effective upon the Court's entry of this Stipulation and at that time shall be the final expression of the Parties' voluntary, full, final, and complete settlement agreement.

10.   The Parties understand that this Stipulation contains the entire agreement between Plaintiff and Defendant; that no promise or inducement has been made except as set forth herein; and that no representations, oral or otherwise, between Plaintiff and Defendant, or their respective counsel, not included herein shall be of any force and effect.

11.   This Stipulation of Settlement may not be altered, modified, withdrawn, waived, rescinded, or supplemented except by written instrument executed by duly authorized representatives of both parties.

2

Executed this _____ day of August, 2013.

Respectfully submitted,

/s/ Marc Rotenberg
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Attorney for Plaintiff

Attorneys for Defendant

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ELECTRONIC PRIVACY INFORMATION CENTER	))))	
Plaintiff,	)	
v.	)	No. 1:12-02053 (ESH)
	)	
UNITED STATES CENTRAL INTELLIGENCE AGENCY	)))	
Defendant.	))	

PROPOSED ORDER DISMISSING WITH PREJUDICE

Upon consideration of the foregoing settlement agreement and stipulation,

Electronic Privacy Information Center v. United States Central Intelligence Agency, Civil

No. 1:12-02053 (ESH), is hereby dismissed with prejudice this _____ day of August,

2013.

SO ORDERED.

_____
ELLEN S. HUVELLE
UNITED STATES DISTRICT JUDGE

1