

Exhibit A

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

_____)	
ELECTRONIC PRIVACY)	
INFORMATION CENTER,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 19-cv-810 (RBW)
)	
UNITED STATES DEPARTMENT OF)	
JUSTICE,)	
)	
Defendant.)	
_____)	

OFFER OF JUDGMENT

Pursuant to Federal Rule of Civil Procedure 68, Defendant hereby offers to allow judgment to be taken against it, in the amount of \$90,001.00, in full resolution of any and all claims by Plaintiff for attorney’s fees or costs in this action (including “fees on fees”). This offer of judgment is made for the purposes specified in Rule 68, and is not to be construed as an admission that Defendant is liable for any costs or attorney’s fees, or that Plaintiff is entitled to them. This offer of judgment is made for settlement purposes only and is subject to Federal Rule of Evidence 408.

Dated: April 6, 2021

Respectfully submitted,

BRIAN M. BOYNTON
Acting Assistant Attorney General
Civil Division

ELIZABETH J. SHAPIRO
Deputy Director
Federal Programs Branch

/s/ Courtney D. Enlow
COURTNEY D. ENLOW
Trial Attorney

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