

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

ELECTRONIC PRIVACY INFORMATION CENTER)	
)	
Plaintiff,)	
)	
v.)	
)	No. 1:13-cv-00345-GK/JMF
U.S. DEPARTMENT OF EDUCATION)	
)	
Defendant.)	
)	

**CONSENT MOTION TO STAY PROCEEDINGS PENDING COMPLETION OF
SETTLEMENT NEGOTIATIONS**

Plaintiff Electronic Privacy Information Center (“EPIC”) and Defendant the U.S. Department of Education hereby respectfully move this Court to stay proceedings to complete settlement negotiations.

The parties have reached an agreement to resolve the litigation and are working to reduce the agreement to writing. The parties anticipate filing a joint stipulation of settlement within seven days.

To allow the parties to complete their settlement negotiations, the parties respectfully move this Court to stay the proceedings for seven days. A proposed Order is attached.

Executed this _____ day of October, 2013.

Respectfully submitted,

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