

**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.	)	
	)	

**STIPULATION OF SETTLEMENT AND DISMISSAL**

Plaintiff, Electronic Privacy Information Center, and Defendant, U.S. Department of Education, hereby settle and compromise the above entitled lawsuit brought under the Freedom of Information Act, 5 U.S.C. § 552, as amended (“FOIA”) on the following terms:

1. Plaintiff agrees to dismiss this suit with prejudice.
2. Defendant agrees to pay Plaintiff \$9,000.00 for payment of attorney’s fees.

Plaintiff agrees to promptly provide the relevant banking and account information to Defendant in order to process that payment.

3. This Stipulation of Settlement constitutes the full and complete satisfaction of any and all claims arising from (a) the allegations set forth in the complaint filed in this lawsuit and (b) any litigation or administrative proceeding that Plaintiff has brought, could bring, or could have brought regarding Plaintiff’s FOIA request in this case.

5. This Stipulation of Settlement does not constitute an admission of liability or fault on the part of Defendant, 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.

6. Except as may be otherwise provided herein, each party will bear its own costs and fees.

7. Execution and filing of this Stipulation of Settlement by counsel for Plaintiff and by counsel for Defendant constitutes a dismissal of this lawsuit, with prejudice, pursuant to Rule 41(a)(1)(A)(ii). Any and all remaining issues are waived.

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Executed On: 11/1/13

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