

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

ELECTRONIC PRIVACY )  
INFORMATION CENTER )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
UNITED STATES DEPARTMENT OF )  
JUSTICE, )  
 )  
Defendant. )  
\_\_\_\_\_ )

Civil Action No. 1:09cv2394 (HHK)

**STIPULATION OF DISMISSAL WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and pursuant to plaintiff's acceptance of defendant's Offer of Judgment on September 28, 2010 (Dkt. No. 16), Plaintiff Electronic Privacy information Center and Defendant United States Department of Justice hereby stipulate to the dismissal of this action with prejudice. This stipulation constitutes final resolution of any claims plaintiff may have against defendant concerning the FOIA request that is the subject of this action. Pursuant to the Offer of Judgment, defendant will pay plaintiff \$5,500.00, which includes all costs accrued, including attorney's fees, in full settlement of all claims. Except as provided for in the Offer of Judgment, each party will bear its own costs and fees.

Date: December 16, 2010

Respectfully submitted,

/s/ John Verdi  
John Verdi, Esquire (DC Bar # 495764)  
Marc Rotenberg, Esquire (DC Bar # 422825)  
ELECTRONIC PRIVACY INFORMATION  
CENTER  
1718 Connecticut Avenue, N.W.

TONY WEST  
Assistant Attorney General  
  
RONALD C. MACHEN JR.  
United States Attorney for the  
District of Columbia

Suite 200  
Washington, D.C. 20009  
(202) 483-1140 (telephone)  
(202) 483-1248 (facsimile)  
[verdi@epic.org](mailto:verdi@epic.org) (email)

Attorney for Plaintiff

ELIZABETH J. SHAPIRO  
Deputy Branch Director

/s/ Jesse Z. Grauman  
JESSE Z. GRAUMAN (Va. Bar No. 76782)  
U.S. Department of Justice  
Civil Division, Federal Programs Branch

Mailing Address:  
Post Office Box 883  
Washington, D.C. 20044

Courier Address:  
20 Massachusetts Ave., N.W.  
Washington, D.C. 20001

Telephone: (202) 514-2849  
Fax: (202) 616-8460  
Email: [jesse.z.grauman@usdoj.gov](mailto:jesse.z.grauman@usdoj.gov)

Attorneys for Defendant