

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

ELECTRONIC PRIVACY INFORMATION

CENTER

*Plaintiff,*

v.

U.S. DEPARTMENT OF DEFENSE,

*Defendant.*

Civil Action No. 14-cv-1555 (TSC)

**DEFENDANT'S NOTICE OF SETTLEMENT IN PRINCIPLE  
AND MOTION TO VACATE ALL DEADLINES**

The parties respectfully notify the Court that the parties have agreed in principle to settle the above-captioned matter. Counsel for the parties are in the process of preparing and finalizing the Settlement Agreement and Stipulated Dismissal ("Agreement"). The parties intend to file the Agreement as soon as practicable, but respectfully request that the parties are given 30 days to file the said Agreement. Accordingly, Defendant respectfully requests that the Court vacate all deadlines as set forth in the May 28, 2015 Minute Order.

Defendant is filing this Notice and Motion with Plaintiff's approval and permission.

June 29, 2105

Respectfully submitted,

VINCENT H. COHEN, JR.  
D.C. BAR # 471489  
Acting United States Attorney

DANIEL F. VAN HORN  
D.C. BAR # 924092  
Chief, Civil Division

By: \_\_\_\_\_//s\_\_\_\_\_  
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**[PROPOSED] ORDER**

Upon consideration of Defendant's Notice of Settlement In Principle and Motion To Vacate All Deadlines and the entire record herein, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2015,

**ORDERED** that Defendant's Notice of Settlement In Principle and Motion To Vacate All Deadlines be and is hereby **GRANTED**; and it is

**ORDERED** that the parties have up to and include July 29, 2015, to file a Stipulated Settlement Agreement and Dismissal; and it is

**FURTHER ORDERED** that all deadlines in the above-captioned case is and hereby **VACTED**.

**SO ORDERED.**

\_\_\_\_\_  
United States District Judge