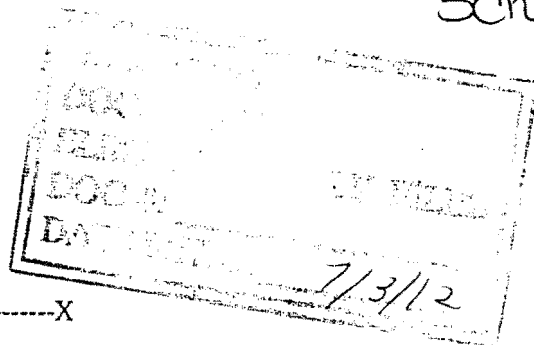


Scheidt & Co., S.



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NATIONAL DAY LABORER ORGANIZING
NETWORK, CENTER FOR CONSTITUTIONAL
RIGHTS, and IMMIGRATION JUSTICE
CLINIC OF THE BENJAMIN N. CARDOZO
SCHOOL OF LAW,

ECF CASE

10-CV-3488 (SAS)(KNF)

Plaintiffs,

**STIPULATION AND ORDER
OF DISMISSAL**

v.

UNITED STATES IMMIGRATION
AND CUSTOMS ENFORCEMENT AGENCY,
UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,
FEDERAL BUREAU OF INVESTIGATION,
EXECUTIVE OFFICE FOR IMMIGRATION
REVIEW, and OFFICE OF LEGAL COUNSEL,

Defendants.

-----X

WHEREAS, on April 27, 2010, National Day Laborer Organizing Network, Kathryn O. Greenberg Immigration Justice Clinic of the Benjamin N. Cardozo School of Law, and Center for Constitutional Rights (collectively "Plaintiffs") filed a complaint ("the Complaint"), seeking the release of certain records by United States Immigration and Customs Enforcement ("ICE"), the United States Department of Homeland Security ("DHS"), the Federal Bureau of Investigation ("FBI"), the Office of Legal Counsel ("OLC"), and the Executive Office for Immigration Review (collectively "Defendants"), pursuant to the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA") (the "Action");

WHEREAS on March 14, 2013, Plaintiffs and Defendants filed a Stipulation and Order of Dismissal agreeing to dismiss the Action with prejudice, subject to the terms set forth in that stipulation;

WHEREAS Plaintiffs and Defendants agreed to toll the time for Plaintiffs to file a motion for attorneys' fees and costs as set forth under Fed. R. Civ. P. 54(d)(2) in order to provide the parties with an opportunity to negotiate attorneys' fees and costs in good faith and avoid further litigation;

WHEREAS, Plaintiffs and Defendants desire to resolve all outstanding issues concerning attorneys' fees and costs on terms that are mutually agreeable;

IT IS HEREBY STIPULATED AND AGREED, by and between the parties as follows:

1. Plaintiffs stipulate and agree to accept this Stipulation in full settlement and satisfaction of any and all claims related to attorneys' fees and costs in connection with the Action.
2. In consideration for the release of Plaintiffs' claims related to attorneys' fees and costs, Defendants agree to pay Plaintiffs \$1,212,500 in compensation for attorneys' fees and costs (the "Settlement Amount").
3. Defendants shall pay the Settlement Amount to Plaintiffs' counsel, Mayer Brown LLP, through electronic funds transfer payments (EFTs) as coordinated among the parties.
4. Defendants shall make best efforts to pay the Settlement Amount to Plaintiffs as soon as practicable.

5. Defendants and Plaintiffs agree that the United States District Court for the Southern District of New York shall retain jurisdiction over any controversy or claim arising out of or relating to this Stipulation.

6. This Stipulation shall be interpreted in accordance with the plain meaning of its terms and not strictly for or against any of the parties hereto.

7. The persons signing this Stipulation warrant and represent that they possess full authority to bind the entities, agencies, and organizations on whose behalf they are signing the Stipulation.

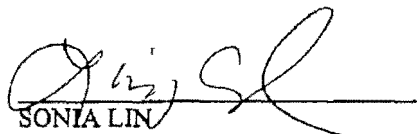
8. This Stipulation contains the entire agreement between the parties, and any statements, representations, promises, agreements, or negotiations, oral or otherwise, between the parties or their counsel that are not included herein shall not be of any force or effect.

Dated: New York, New York
June 28, 2013

PREET BHARARA
United States Attorney for
Southern District of New York
Attorney for Defendants

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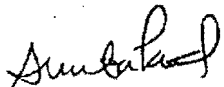
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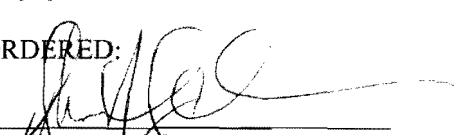
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SO ORDERED:



HON. SHIRA A. SCHEINDLIN
United States District Judge

AS 7/2/13