

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**MIAMI DIVISION**

**Case No. 07-21088-CIV-ALTONAGA**

MIAMI FOR PEACE, INC., SOUTH FLORIDA  
PEACE AND JUSTICE NETWORK, and HAITI  
SOLIDARITY, INC.,

Plaintiffs,

v.

MIAMI-DADE COUNTY, a political subdivision of  
the State of Florida,

Defendant.

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**STIPULATION OF SETTLEMENT**

The Plaintiffs, MIAMI FOR PEACE, INC., SOUTH FLORIDA PEACE AND JUSTICE NETWORK, and HAITISOLIDARITY, INC., and Defendant, MIAMI-DADE COUNTY, a political subdivision of the State of Florida, by and through their respective undersigned attorneys, hereby settle the claims remaining in dispute between them as to compensatory damages and attorneys' fees on the following terms:

1. The parties acknowledge that the Court has awarded declaratory and permanent injunctive relief to Plaintiffs, precluding Defendants from enforcing Miami-Dade Code Sections 30-274 and 21-31.1(b).
2. Pursuant to the terms of the Releases, the County will pay compensatory damages and attorneys' fees to the Plaintiffs.
3. The County Manager's Office has already approved the settlement of compensatory

damages and attorneys' fees referenced in Paragraph 2 above, and no further County approvals are required.

4. Each Plaintiff shall execute a Release to the County (including its officers, agents, and employees) on a form jointly acceptable to the County Attorney and the Plaintiffs' attorneys, with respect to the claims for compensatory damages and attorneys' fees.

5. Plaintiffs retain the right to seek judicial enforcement of the declaratory and permanent injunctive relief granted by the Court in its Order dated June 4, 2008, should the County violate the permanent injunction in the future, and Plaintiffs also retain the right to seek attorneys' fees pursuant to 42 U.S.C. § 1988 for such future enforcement efforts.

Dated: August 20, 2008

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