

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

_____ )	
UNIDAD LATINA EN ACCIÓN and )	
JUNTA FOR PROGRESSIVE ACTION, INC., )	Civ. No. 3:07-cv-01224-MRK
)	
Plaintiffs, )	
)	
v. )	
)	
UNITED STATES DEPARTMENT OF )	
HOMELAND SECURITY,         ) )	
) )	November 4, 2009
Defendant.                             ) )	
_____ )	

**JOINT STIPULATION RESOLVING ALL REMAINING CLAIMS OTHER THAN  
COSTS AND ATTORNEYS' FEES**

WHEREAS Unidad Latina en Acción and Junta for Progressive Action, Inc. (collectively, "Plaintiffs") filed FOIA Requests 07-52939, 07-52604 and 07-53311 seeking disclosure of records from the U.S. Department of Homeland Security Bureau of Immigration and Customs Enforcement ("Defendant");

WHEREAS Plaintiffs filed the present action to compel the release of the requested records on August 10, 2007;

WHEREAS Plaintiffs have challenged the adequacy of Defendant's search for records and Defendant's failure to disclose records;

WHEREAS pursuant to a joint stipulation [dkt # 111] and rulings and orders of this Court [dkt # 60, 67, 68, 93, 106, 109] all claims pertaining to the adequacy of Defendant's search for records have previously been resolved;

WHEREAS the parties have briefed the propriety of Defendant's assertion of exemptions from disclosure [dkt # 19, 20, 21, 77, 79, 87] and the Court has ruled on the propriety of a number of such asserted exemptions [dkt # 37, 81; 104];

WHEREAS Defendant has subsequently reviewed the outstanding exemptions asserted, released further responsive records to Plaintiffs in part or in full, and produced additional Vaughn indices to Plaintiffs;

WHEREAS Plaintiffs do not concede the adequacy of any of the Vaughn indices produced or the propriety of the asserted exemptions on which the Court has not ruled, but also do not seek further relief from this Court in regard to any of the Vaughn indices produced or the propriety of exemptions asserted by Defendant and on which the Court has not ruled;

WHEREAS Defendant asserts that the Vaughn indices no longer challenged by Plaintiffs are legally sufficient and that all remaining exemptions are properly asserted under the Freedom of Information Act;

NOW THEREFORE the Parties hereby jointly enter into the following stipulation:

1. With the exception of costs and attorneys' fees, the Parties seek no further relief in this action;
2. With the exception of costs and attorneys' fees, all remaining claims in this action are subject to dismissal with prejudice by this Court;
3. In accordance with this stipulation, all prior stipulations between the parties and the Court's rulings and orders, judgment shall enter for Plaintiffs in part and for Defendant in part;



