

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

**FILED**

APR 22 2003

NANCY MAYER WHITTINGTON, CLERK  
U.S. DISTRICT COURT

_____	)
SONALI IYENGAR, <i>et al.</i> ,	)
	)
Plaintiffs,	)
	)
v.	)
	)
BARNHART, <i>et al.</i> ,	)
	)
Defendants.	)
_____	)

Civil Action No. 02-0825 (ESH)  
Hon. Ellen S. Huvelle

**SETTLEMENT AGREEMENT AND ORDER OF DISMISSAL**

WHEREAS, there is presently pending before the Court plaintiffs’ motion or application for award of fees and other expenses, and

WHEREAS, it is the mutual wish of the parties to resolve the remaining issues in this action without further litigation, and

WHEREAS, it is the mutual wish of the parties to close this case,

NOW, THEREFORE, the parties enter into this Settlement Agreement for the purpose of effecting a full and complete settlement of all outstanding matters in this action upon the following terms and conditions:

1. Defendant Social Security Administration (“SSA”) shall pay to Gaillard T. Hunt, counsel for plaintiffs, the sum of Fifty Thousand Dollars (\$50,000), in full and complete satisfaction of all attorney’s fees, expenses, and costs against all defendants for all court proceedings in this action.

2. Plaintiffs hereby withdraw their pending motion or application for award of fees and other expenses. Plaintiffs and their counsel agree to waive, in this or any other forum, any right to attorneys’ fees and other expenses which have resulted from this litigation and the events underlying this litigation.

3. Neither this Settlement Agreement nor any matter contained herein shall be deemed or construed to constitute evidence of liability, or an admission by any party on any issue of fact or law raised in this action.

4. The Plaintiffs' demand for attorneys' fees, costs, and other expenses is hereby dismissed with prejudice.

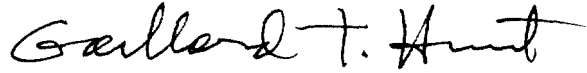
5. This case is dismissed in accordance with the terms and conditions of this Settlement Agreement and the Court's Memorandum Opinion and Order dated November 26, 2002, and is hereby closed.

6. This Settlement Agreement contains the entire agreement of the parties concerning the subject matter of this litigation. The parties acknowledge, represent, and agree that in executing this Settlement Agreement, they do not and have not relied upon any representations or statements, other than those contained within this Settlement Agreement, by any other party or by their agents, officers, representatives, or attorneys with regard to the subject matter, basis, or effect of this Settlement Agreement.

7. The parties signing this Settlement Agreement are represented by counsel, and are fully informed as to the contents of this Settlement Agreement, and sign hereon freely without being under any duress or undue influence. The actual persons signing below represent and warrant his or her ability to bind the respective party, and by the signature below, each party agrees that the person signing has the apparent authority to bind their respective party to the signature.

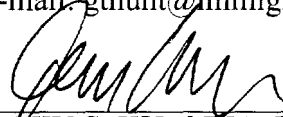
**FOR THE PLAINTIFFS:**

Date: April 1, 2003



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**FOR THE DEFENDANTS:**

ROBERT D. McCALLUM, JR.  
Assistant Attorney General

ROSCOE C. HOWARD, JR.  
United States Attorney  
for the District of Columbia

RICHARD G. LEPLEY  
Assistant Director, Federal Programs Branch

Date: April 3, 2003



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SO ORDERED, THIS 22 DAY OF April, 2003:

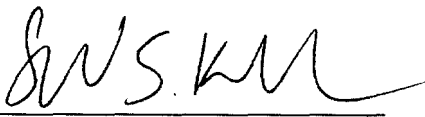


THE HON. ELLEN S. HUVELLE  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing via first class mail on April 3, 2003, to the following counsel of record:

Gaillard T. Hunt, Esq.  
Rajiv S. Khanna, Esq.  
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*Attorney for Plaintiffs*

  
\_\_\_\_\_  
Sharad S. Khandelwal