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SEP 9 - 2008

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON DEPUTY

BY

NORTHWEST IMMIGRANT RIGHTS PROJECT )  
ET AL. )

vs. )

U.S. BUREAU OF CITIZENSHIP AND )  
IMMIGRATION SERVICES, ET AL. )

NO. 88-379R

JOINT STIPULATION OF  
SETTLEMENT RE:  
ATTORNEY'S FEES AND COSTS


The substance of this action having been settled fully by the agreement filed concurrently herewith, plaintiffs and defendants, by and through their undersigned counsel, hereby agree and stipulate to settle plaintiffs' claims for attorney's fees and costs incurred in this action as follows:

1. Defendants will pay Plaintiffs \$1,775,000 in full settlement of all claims they may have for attorneys' fees, plus costs to be itemized and not to exceed \$35,000, whether under the Equal Access to Justice Act ("EAJA") 28 U.S.C. § 2412(d), or otherwise, provided that the Court approves the stipulation for settlement of the merits filed concurrently herewith, and final judgment is entered not subject to appeal or termination. In the event the Court declines to approve the stipulation for settlement of the merits filed concurrently herewith, this stipulation shall be null and void.

2. Attorneys fees and costs under this agreement shall be made payable to Gibbs, Houston & Pauw, 1000 Second Ave. Suite 1600, Seattle, WA 98104, and such payment will release Defendants from all payment obligations to Plaintiffs under EAJA and any other applicable law or regulation.




88-CV-00379-PET

1   
2 Anthony W. Norwood  
3 U.S. Department of Justice  
4 P.O. Box 878, Ben Franklin Station  
Washington, DC 20044  
202-616-4883

5 Counsel for Defendants

6 Dated: *May 27, 2008*

  
Robert H. Gibbs, Esq.  
Robert Pauw, Esq.  
Gibbs Houston Pauw  
1000 Second Ave. Suite 1600  
Seattle, WA 98104


Counsel for Plaintiffs

Dated: *5/28/08*

13 ORDER

14 IT IS SO ORDERED.

15  
16 Dated: *9/9, 2008.*

  
HONORABLE JAMES L. ROBERT  
UNITED STATES DISTRICT JUDGE