

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

AMERICAN CIVIL LIBERTIES UNION, *et al.*,

Plaintiffs,

v.

DEPARTMENT OF JUSTICE, *et al.*,

Defendants.

No. 1:10-cv-436-RMC

**STIPULATION REGARDING VOLUNTARY DISMISSAL
OF CLAIMS AGAINST CERTAIN PARTIES**

The Parties in the above-captioned Freedom of Information Act case have conferred and reached a stipulated agreement that all claims against Defendants Department of Justice (“DOJ”), Department of Defense (“DOD”), and Department of State (“DOS”) shall be voluntarily dismissed from this action with prejudice. The Parties advise the Court of this agreement as follows:

1. On March 16, 2010, Plaintiffs American Civil Liberties Union and American Civil Liberties Union Foundation (collectively, “Plaintiffs”) filed a complaint for injunctive relief pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), naming as Defendants the Department of Justice, Department of Defense, and Department of State;
2. On June 1, 2010, Plaintiffs filed an amended complaint adding Defendant Central Intelligence Agency (“CIA”);
3. Defendant CIA moved for summary judgment on October 1, 2010; Plaintiffs cross-moved for partial summary judgment on November 1, 2010; and the Court granted the CIA’s motion and denied Plaintiffs’ motion on September 9, 2011;

4. Pursuant to Federal Rule of Civil Procedure 54(b), the Court's order of September 9, 2011 is not yet a final appealable order because claims remain unadjudicated as to the Defendants other than CIA;
5. Defendants DOJ, DOD, and DOS have now completed production of records and *Vaughn* indices in accordance with schedules set by the Court;
6. A status report is due to the Court on October 26, 2011;
7. Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate that all claims against Defendants DOJ, DOD, and DOS are voluntarily dismissed from this action with prejudice;
8. Summary judgment having previously been granted in favor of the remaining defendant, this action may now be closed on the Court's docket.

Respectfully submitted,

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Dated: October 26, 2011

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