

1 Matthew Strugar (State Bar No. 232951)
matthew@matthewstrugar.com
2 Law Office of Matthew Strugar
3435 Wilshire Blvd., Suite 2910
3 Los Angeles, CA 90010
323-696-2299

4 Attorneys for Plaintiff

5 NICOLA T. HANNA
6 United States Attorney
DAVID M. HARRIS
7 Assistant United States Attorney
Chief, Civil Division
8 JOANNE S. OSINOFF
Assistant United States Attorney
9 Chief, General Civil Section
MATTHEW J. BARRAGAN (Cal. Bar No. 283883)
10 Assistant United States Attorney
Federal Building, Suite 7516
11 300 North Los Angeles Street
Los Angeles, California 90012
12 Telephone: (213) 894-8827/2444
Facsimile: (213) 894-7819
13 E-mail: Matthew.Barragan@usdoj.gov

14 Attorneys for Defendant

15 UNITED STATES DISTRICT COURT
16 FOR THE CENTRAL DISTRICT OF CALIFORNIA
17 WESTERN DIVISION
18

19 ACLU OF SOUTHERN CALIFORNIA,
20 Plaintiff,
21 v.
22 UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,
23 Defendant.
24

No. CV 18-08917 JAK (JEMx)
STIPULATION OF DISMISSAL
Honorable John A. Kronstadt

25
26
27
28

1 Plaintiff ACLU of Southern California (“Plaintiff”) and Defendant United States
2 Department of Homeland Security (“Defendant” or “DHS”) hereby submit the following
3 Stipulation to Dismiss.

4 WHEREAS, Plaintiff submitted a Freedom of Information Act (“FOIA”) request
5 to Defendant on February 12, 2018.

6 WHEREAS, on October 16, 2018, Plaintiff filed a complaint pursuant to 5 U.S.C.
7 § 552(a)(4)(B), alleging unlawful withholding of FOIA documents and requesting the
8 Court order Defendant to produce the requested agency records.

9 WHEREAS, Plaintiff is now satisfied with the production Defendant made in
10 response to the FOIA request.

11 WHEREAS, Plaintiff and Defendant agree that dismissal of this action is in the
12 best interest of the parties and judicial efficiency.

13 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and
14 Defendant, through their respective counsel, that this action be dismissed with prejudice
15 pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii). Plaintiff reserves the right
16 to seek an award of attorney’s fees and costs in the time provided by Local Rules 54-2
17 and 54-7, and Defendant reserves its right to oppose any such request.

18
19 Dated: February 3, 2020

LAW OFFICE OF MATTHEW STRUGAR

20
21 /s/ Matthew Strugar
22 MATTHEW STRUGAR

23 Attorneys for Plaintiff
24 ACLU of Southern California
25
26
27
28

1 Dated: February 3, 2020

NICOLA T. HANNA
United States Attorney
DAVID M. HARRIS
Assistant United States Attorney
Chief, Civil Division
JOANNE S. OSINOFF
Assistant United States Attorney
Chief, General Civil Section

6
7 /s/ Matthew J. Barragan
MATTHEW J. BARRAGAN*
Assistant United States Attorney

8
9 Attorneys for Defendant
U.S. Department of Homeland Security

10 *Pursuant to Local Rule 5-4.3.4(2), the filer attests that all signatories listed, and
11 on whose behalf the filing is submitted, concur in the filing's content and have
12 authorized the filing.