

Autumn M. Elliott (SBN 230043)
Ben Conway (SBN 246410)
DISABILITY RIGHTS CALIFORNIA
350 S. Bixel Street, Suite 290
Los Angeles, CA 90017
Telephone: (213) 213-8000
Fax: (213) 213-8001
autumn.elliott@disabilityrightsca.org
ben.conway@disabilityrightsca.org

Eve Hill
Jessica P. Weber
Alyssa L. Hildreth
BROWN GOLDSTEIN LEVY
120 E. Baltimore Street, Suite 1700
Baltimore, MD 21202
Telephone: (410) 962-1030
Fax: (410) 385-0869
JWeber@browngold.com
AHildreth@browngold.com

Attorneys for Plaintiffs

ETHAN P. DAVIS
Acting Assistant Attorney General
CARLOTTA P. WELLS
Assistant Branch Director
M. ANDREW ZEE (CA Bar No. 272510)
Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
450 Golden Gate Avenue, Room 7-5395
San Francisco, CA 94102
Telephone: (415) 436-6646
Facsimile: (415) 436-6632
E-mail: m.andrew.zee@usdoj.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

KAREN ROSE, ANNE L. PEYTON, RONZA
OTHMAN, and THE NATIONAL
FEDERATION OF THE BLIND, INC.,

Plaintiffs,

v.

STEVEN TERNER MNUCHIN, Secretary of
the U.S. Department of the Treasury, in his
official capacity,

Defendant.

No. 4:19-cv-04254-HSG

**JOINT STIPULATION OF DISMISSAL
WITH PREJUDICE**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs, Karen Rose, Anne L. Peyton, Ronza Othman, and The National Federation of the Blind, Inc., and Defendant, Steven Turner Mnuchin, sued solely in his official capacity as Secretary of the Treasury (collectively “the Parties”), stipulate to the dismissal with prejudice of this action in its entirety. This Joint Stipulation of Dismissal incorporates the terms of the Settlement Agreements executed by the Parties on July 10, 2020, which are attached as Exhibits 1 and 2. The Parties have agreed, pursuant to Paragraph 64 of Exhibit 1, not to dispute that filing a motion pursuant to Fed. R. Civ. P. 60(b)(6) seeking relief from this Joint Stipulation of Dismissal after exhausting the dispute resolution procedures described in Paragraphs 60-63 of Exhibit 1 constitutes an appropriate mechanism to seek enforcement of the provisions of Exhibit 1.

Dated: July 14, 2020

Respectfully submitted,

U.S. DEPARTMENT OF JUSTICE

ETHAN P. DAVIS
Acting Assistant Attorney General

CARLOTTA P. WELLS
Assistant Branch Director

/s/ M. Andrew Zee
M. ANDREW ZEE (CA Bar No. 272510)
Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
450 Golden Gate Avenue, Room 7-5395
San Francisco, CA 94102
Telephone: (415) 436-6646
Facsimile: (415) 436-6632
E-mail: m.andrew.zee@usdoj.gov

Attorneys for Defendant

/s/ Autumn M. Elliott
Autumn M. Elliott (SBN 230043)

Ben Conway (SBN 246410)
DISABILITY RIGHTS CALIFORNIA
350 S. Bixel Street, Suite 290
Los Angeles, CA 90017
Telephone: (213) 213-8000
Fax: (213) 213-8001
autumn.elliott@disabilityrightsca.org
ben.conway@disabilityrightsca.org

Eve Hill
Jessica P. Weber
Alyssa L. Hildreth
BROWN GOLDSTEIN LEVY
120 E. Baltimore Street, Suite 1700
Baltimore, MD 21202
Telephone: (410) 962-1030
Fax: (410) 385-0869
JWeber@browngold.com
AHildreth@browngold.com

Attorneys for Plaintiffs

ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest that I am the ECF user whose user ID and password are being used in the electronic filing of this document, and further attest that I have obtained the concurrence in the filing of the document from the other signatory.

/s/ Autumn M. Elliott
AUTUMN M. ELLIOTT