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14 *Attorneys for the Defendants*

15 UNITED STATES DISTRICT COURT  
 16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

18 FREEDOM FOR IMMIGRANTS,  
 19 Plaintiff,  
 20  
 21 vs.  
 22 U.S. DEPARTMENT OF HOMELAND  
 23 SECURITY, *et al.*,  
 24 Defendants.

Case No. CV 19-10424-AB (GJSx)

**NOTICE OF SETTLEMENT**

Judge: Hon. André Birotte Jr.

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**NOTICE OF SETTLEMENT**

Plaintiff, Freedom for Immigrants (“FFI”), and Defendants, U.S. Department of Homeland Security (“DHS”), Alejandro N. Mayorkas, Secretary of DHS, U.S. Immigration and Customs Enforcement (“ICE”), Tae D. Johnson, Acting Director for ICE, and Matthew C. Allen, Acting Deputy Director for ICE, (collectively, the “Parties”), respectfully submit this Notice of Settlement regarding FFI’s December 10, 2019 Complaint for Injunctive and Declaratory Relief. ECF No. 1. To that end, the Parties state as follows:

1. The Parties have reached an agreement to resolve this action. *See* Exhibit A, Settlement Agreement. Under the terms of the Settlement Agreement, which the Parties signed on July 1, 2021, ICE agrees to provide FFI an extension on the ICE Detainee Telephone Service pro bono platform (“DTS pro bono platform”) that is free and confidential, without interruption or interference, for a five-year period. The Government also agrees to pay \$100,970.34 to resolve FFI’s claims for attorneys’ fees and costs. FFI agrees to abide by the terms regarding restricted calls as set forth in Paragraph 2.3 of the Settlement Agreement and the dispute resolution terms as set forth in Paragraph 2.4 of the Settlement Agreement. Further, should ICE establish a new public-facing policy that is applied equally to all organizations using the DTS pro bono platform within the five-year term of the Settlement Agreement, FFI agrees to comply with the new policy within six months following the termination of the Settlement Agreement if it is to continue operating the extension.
2. The Parties request that all upcoming case deadlines be cancelled, and that the hearing on Defendants’ Motion to Dismiss or, Alternatively, to Transfer Venue, set for July 2, 2021 and the Settlement Conference set for July 16, 2021, be taken off calendar.

- 1 3. Per Section 2.5 of the Settlement Agreement, the proper dismissal documents  
2 will be filed within seven (7) business days following the complete execution  
3 of the Settlement Agreement.
- 4 4. This Notice of Settlement shall not be construed to amend, change, or modify  
5 the Parties' Settlement Agreement.

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7 Dated: July 1, 2021

Respectfully submitted,

8 BRIAN M. BOYNTON  
9 Acting Assistant Attorney General  
10 Civil Division

11 WILLIAM C. PEACHEY  
12 Director

13 SAMUEL P. GO  
14 Assistant Director

15 NICOLE P. GRANT  
16 Senior Litigation Counsel

17 By: /s/Anna L. Dichter  
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25 By: /s/ Moez M. Kaba  
26 MOEZ M. KABA

*Attorney for Plaintiff Freedom for Immigrants*

1           **ATTESTATION PURSUANT TO LOCAL RULE 5-4.3.4(a)(2)(i)**

2           Pursuant to Local Rule 5-4.3.4(a)(2)(i), I, Anna L. Dichter, attest that all  
3 other signatories listed and on whose behalf the filing is submitted concur in  
4 this filing's content and have authorized this filing.

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By: /s/ Anna L. Dichter  
Anna L. Dichter