

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DILLEY PRO BONO PROJECT, 111 Pipes Drive,
Dilley, TX 78017; CAROLINE PERRIS, 111 Pipes
Drive, Dilley, TX 78017; and SHALYN
FLUHARTY, 111 Pipes Drive, Dilley, TX 78017,

Plaintiffs,

v.

U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT, 500 12th Street, S.W.,
Washington, DC 20536; U.S. DEPARTMENT
OF HOMELAND SECURITY, 3801 Nebraska
Avenue, N.W., Washington, DC 20016; ELAINE
DUKES, Acting Secretary of Homeland Security, in
her official capacity, 3801 Nebraska Avenue, N.W.,
Washington, DC 20016; THOMAS D. HOMAN,
Acting Director, U.S. Immigration and Customs
Enforcement, in his official capacity, 500 12th
Street, S.W., Washington, DC 20536; and DANIEL
A. BIBLE, Field Office Director, U.S. Immigration
and Customs Enforcement, in his official capacity,
1777 NE Loop 410, Suite 1500, San Antonio, TX
78217,

Defendants.

Civil Action No.
1:17-cv-01055 (CRC)

**JOINT MOTION FOR ENTRY OF STIPULATION AND PROPOSED ORDER
DISMISSING CASE WITH PREJUDICE AND RETAINING JURISDICTION FOR THE
PURPOSE OF ENFORCING SETTLEMENT**

Plaintiffs and Defendants (collectively, the “Parties”), by and through their
respective undersigned counsel, respectfully submit this joint motion for entry of the Stipulation
and Proposed Order Dismissing Case With Prejudice and Retaining Jurisdiction for the Purpose
of Enforcing Settlement (the “Stipulation and Proposed Order”), attached hereto as Exhibit A.

On June 1, 2017, Plaintiffs filed a Complaint for Declaratory and Injunctive
Relief and Application for a Preliminary Injunction against Defendants. The Parties filed Joint

Motions to Enlarge Time for Defendants to Respond to Plaintiffs' Motion for a Preliminary Injunction and Complaint on June 14, 2017, June 23, 2017, June 30, 2017, July 12, 2017, July 21, 2017, and August 4, 2017. The Parties filed a Notice of Settlement on August 11, 2017.

On August 15, 2017, the Parties entered into a Stipulated Settlement Agreement, attached hereto as Exhibit 1 to the Stipulation and Proposed Order, which is subject to this Court's agreement to retain jurisdiction to enforce the terms of the settlement until February 15, 2020, which is a period of 2.5 years from August 15, 2017. The Parties now respectfully request entry of the Stipulation and Proposed Order, which incorporates by reference and effectuates the terms of the Stipulated Settlement Agreement.

Dated: Washington, D.C.
August 15, 2017

/s/ Amanda Flug Davidoff

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