

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)

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

WHEREAS, on August 15, 2017, Plaintiffs and Defendants (collectively, the
“Parties”) entered into a Stipulated Settlement Agreement, attached hereto as Exhibit 1, resolving
the claims asserted against Defendants in the above-captioned action (the “Action”);

WHEREAS, the Stipulated Settlement Agreement is conditioned on this Court’s
retention of jurisdiction over this Action for a period of 2.5 years for the purpose of enforcing the
terms of the Stipulated Settlement Agreement;

WHEREAS, the Parties seek dismissal of the Action with prejudice;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND ORDERED that:

1. This Action is dismissed with prejudice;
2. The terms of the Stipulated Settlement Agreement are incorporated by reference in this Order;
3. In accordance with paragraph 6 of the Stipulated Settlement Agreement, this Court shall retain jurisdiction over this Action for the purpose of enforcing the terms of the Stipulated Settlement Agreement until February 15, 2020, which is a period of 2.5 years from August 15, 2017; and
4. Any motion brought for the purpose of enforcing the terms of the Stipulated Settlement Agreement shall be referred to Judge Christopher Cooper, or a magistrate judge designated by Judge Cooper, for resolution.

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

/s/ Amanda Flug Davidoff

Amanda Flug Davidoff (DC Bar No. 978033)
Lucas Lallinger (DC Bar No. 1046778)
Sullivan & Cromwell LLP
1700 New York Avenue, N.W.
Suite 700
Washington, DC 20006

Richard H. Klapper (*pro hac vice* motion pending)
Veronica W. Ip (*pro hac vice* motion pending)
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004

/s/ Melissa Crow

Melissa Crow (DC Bar No. 453487)
American Immigration Council
1331 G Street, N.W., Suite 200
Washington, DC 20005

/s/ Rebecca Scholtz

Rebecca Scholtz (*pro hac vice* motion pending)
Catholic Legal Immigration Network, Inc.
c/o University of St. Thomas Interprofessional Center
30 South 10th Street
Minneapolis, MN 55403

Attorneys for Plaintiffs

/s/ Elianis N. Perez

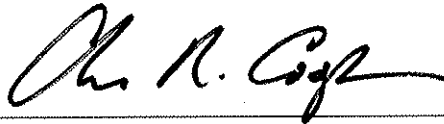
Elianis N. Perez (DC Bar No. 983176)
Senior Litigation Counsel
U.S. Department of Justice
Civil Division
Office of Immigration Litigation, District Court Section
PO Box 868, Ben Franklin Station
Washington, DC 20442

Attorney for Defendants

SO ORDERED

August 16, 2017

Date



Christopher R. Cooper
United States District Judge