UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN CIVIL LIBERTIES UNION, ELECTRONIC PRIVACY INFORMATION CENTER, AMERICAN BOOKSELLERS FOUNDATION FOR FREE EXPRESSION, and FREEDOM TO READ FOUNDATION,

Plaintiffs,

Civil Action No. 03-CV-2522 (ESH)

v.

UNITED STATES DEPARTMENT OF JUSTICE,

Defendant.

MOTION TO DISMISS THE CASE WITH PREJUDICE

Plaintiffs American Civil Liberties Union, Electronic Privacy Information Center, American Booksellers Foundation for Free Expression, and Freedom to Read Foundation ("Plaintiffs"), and defendant United States Department of Justice ("Defendant"), have agreed to a settlement of this litigation. Under the terms of this settlement, plaintiffs have agreed to move and hereby move to dismiss this case with prejudice.

Raphael O. Gomez, counsel for the defendant, has advised counsel for the plaintiffs that defendants do not oppose the granting of this motion.

A proposed order is attached hereto.

Respectfully submitted,

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