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**LODGED**

**FEB 27 2004**

CLERK U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

12 COUNSEL FOR DEFENDANTS *[Signature]*

13 CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW  
14 Peter A. Schey  
Carlos Holguin  
15 256 S. Occidental Blvd.  
Los Angeles, CA 90057  
16 (213) 388-8693

17 Attorneys for plaintiffs (additional counsel for plaintiffs  
on continuation page)

18 IN THE UNITED STATES DISTRICT COURT  
19 FOR THE EASTERN DISTRICT OF CALIFORNIA  
WESTERN DIVISION

20 CATHOLIC SOCIAL SERVICES, INC., )  
21 et al., )

CIV. NO. S-86-1343 LKK

22 Plaintiffs )

JOINT STIPULATION OF SETTLEMENT  
RE: ATTORNEY'S FEES AND COSTS;  
23 ~~Proposed~~ ORDER THEREON.

24 TOM RIDGE, Secretary, U.S. Department  
of Homeland Security, et al., )

Hearing: None  
Time: n/a

25 Defendants )  
26 )  
27 )  
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1 Additional counsel for plaintiffs:

2 ALTSHULER, BERZON, NUSSBAUM, RUBIN & DEMAIN  
3 Michael Rubin  
4 177 Post Street, Suite 300  
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11 Of Counsel:  
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13 Berkley, CA 94710

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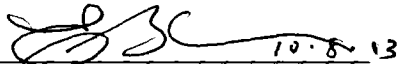
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1 The substance of this action having been settled fully by the agreement filed concurrently  
2 herewith, plaintiffs and defendants, by and through their undersigned counsel, hereby agree and  
3 stipulate to settle plaintiffs' claims for attorney's fees and costs incurred in this action as follows:

4 1. Defendants will pay Plaintiffs \$3,500,000 in full settlement of all claims they may  
5 have for attorneys' fees, whether under the Equal Access to Justice Act ("EAJA"), or otherwise,  
6 and \$100,000 in full settlement of all claims they may have for costs, *provided* that the Court  
7 approves the stipulation for settlement of the merits filed concurrently herewith. In the event the  
8 Court declines to approve the stipulation for settlement of the merits filed concurrently herewith,  
9 this stipulation shall be null and void.


10 2. Attorneys fees and costs under this agreement shall be made payable to Center for  
11 Human Rights & Constitutional Law, 256 S. Occidental Blvd., Los Angeles, CA 90057, and  
12 such payment will release Defendants from all payment obligations to Plaintiffs under EAJA and  
13 any other applicable law or regulation.

14 3. This agreement is conditioned upon approval by the Secretary of the U.S. Department  
15 of Homeland Security, and the Associate Attorney General, United States Department of Justice,  
16 and is contingent upon the district court's approval of the stipulation for settlement of the merits  
17 filed concurrently herewith.

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19   
Earle B. Wilson  
U.S. Department of Justice  
P.O. Box 878, Ben Franklin Station  
Washington, DC 20044  
202-616-4277  
Counsel for Defendants

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Robert R. Raymond  
Associate General Counsel  
U.S. Department of Homeland Security  
U.S. Citizenship and Immigration Services

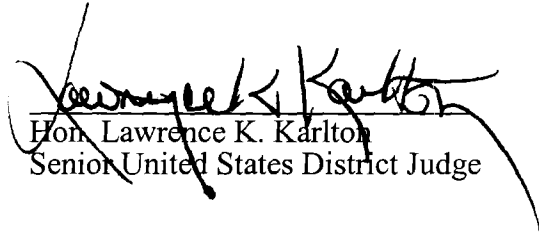
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25  
26 Dated: 10 / 8 / 03

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28  
  
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Center for Human Rights  
and Constitutional Law  
256 S. Occidental Blvd.  
Los Angeles, CA 90057  
(213) 388-8693  
Counsel for Plaintiffs  
  
Dated: 10-13-03

ORDER

IT IS SO ORDERED.

Dated: 3/4, 2003.

  
Hon. Lawrence K. Karlton  
Senior United States District Judge

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United States District Court  
for the  
Eastern District of California  
March 5, 2004

\* \* CERTIFICATE OF SERVICE \* \*

2:86-cv-01343

Catholic Social Svc

v.

Orantes

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I, the undersigned, hereby certify that I am an employee in the Office of the Clerk, U.S. District Court, Eastern District of California.

That on March 5, 2004, I SERVED a true and correct copy(ies) of the attached, by placing said copy(ies) in a postage paid envelope addressed to the person(s) hereinafter listed, by depositing said envelope in the U.S. Mail, by placing said copy(ies) into an inter-office delivery receptacle located in the Clerk's office, or, pursuant to prior authorization by counsel, via facsimile.

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AR/LKK

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Jack L. Wagner, Clerk

BY: 

Deputy Clerk