

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

KENNISON BATTLE, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 99cv1788 (RCL)
	)	
DISTRICT OF COLUMBIA, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**STIPULATION**

Plaintiffs Shannon Battle, Bernard Brown, Eugene Scott, Vonsauli Smith, and Timothy Williams and defendant District of Columbia, by signature of counsel below, stipulate as follows:

1. Plaintiffs waive recovery of attorneys' fees under 42 U.S.C. § 1988.
2. If the Court or jury finds that an employee of the District of Columbia (whether a defendant or not) caused or subjected a plaintiff to deprivation of a constitutional right, the District of Columbia will be liable to the plaintiff under 42 U.S.C. § 1983 for compensatory damages for injury proximately caused by the deprivation. (Plaintiff need not present evidence that a District of Columbia custom, policy, or practice, or personal action by a District of Columbia policymaker, caused or subjected plaintiff to the deprivation.)

Respectfully submitted,

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