

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

_____)	
CITIZENS FOR RESPONSIBILITY & ETHICS)	
IN WASHINGTON,)	
)	
Plaintiff,)	
)	Case No: 1:17-cv-01836 (APM)
v.)	
)	
U.S. SMALL BUSINESS ADMINISTRATION,)	
)	
Defendant.)	
_____)	

NOTICE OF SETTLEMENT AND STIPULATION OF DISMISSAL

Defendant, the United States Small Business Administration (“Defendant”), and Plaintiff, Citizens for Responsibility and Ethics in Washington (“Plaintiff”) (collectively “the Parties”), hereby stipulate and agree as follows:

1. The Parties agree to settle and compromise the above-captioned action under the terms and conditions set forth below.
2. Defendant shall pay Plaintiff a lump sum of \$1,878.40 in attorneys’ fees and costs in this matter.
3. Payment of such attorneys’ fees and costs will be made by electronic transfer of funds to a bank account specified by Plaintiff. Upon filing this Notice of Settlement and Stipulation of Dismissal, the Parties will promptly cause the documentation necessary for this payment to be completed and transmitted.
4. This Notice of Settlement and Stipulation of Dismissal shall represent full and complete satisfaction of all claims arising from the allegations set forth in the Complaint filed in the above-captioned action. This Notice of Settlement and Stipulation of Dismissal shall

not constitute an admission of liability or fault on the part of the Defendant or the United States or their agents or employees.

5. This Notice of Settlement and Stipulation of Dismissal is understood not to preclude or prevent Plaintiff from seeking through the Freedom of Information Act, or other means, records not sought in this Freedom of Information Act request that gave rise to this action.
6. Execution and filing of this Notice of Settlement and Stipulation of Dismissal by counsel for the Parties shall constitute a dismissal of this action with prejudice pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii).

Dated: February 7, 2018

Respectfully submitted,

JESSIE K. LIU, D.C. BAR NO. 472845
United States Attorney

DANIEL F. VAN HORN, D.C. Bar No. 924092
Chief, Civil Division

By: /s/ Scott L. Sroka
SCOTT LEESON SROKA
Member of New York Bar
Assistant United States Attorney
555 Fourth Street, N.W.
Washington, D.C. 20530
Telephone: 202-252-7113
Scott.Sroka@usdoj.gov

Counsel for Defendant

/s/ Laura C. Beckerman
LAURA C. BECKERMAN
Pro Hac Vice
(California Bar No. 278590)
Anne L. Weismann
(D.C. Bar No. 298190)
Citizens for Responsibility
and Ethics in Washington
455 Massachusetts Ave., N.W.
Washington, D.C. 20001
Phone: (202) 408-5565
Facsimile: (202) 897-1996
L.Beckerman@citizensforethics.org

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I certify that, on February 7, 2018, I caused the NOTICE OF SETTLEMENT AND STIPULATION OF DISMISSAL to be served by filing the same with the United States District Court for the District of Columbia via the Court's CM/ECF system.

/s/ Laura C. Beckerman

Laura C. Beckerman