

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

CITIZENS FOR RESPONSIBILITY AND ETHICS  
IN WASHINGTON; AMERICAN HISTORICAL  
ASSOCIATION; and SOCIETY FOR  
HISTORIANS OF AMERICAN FOREIGN  
RELATIONS,

*Plaintiffs,*

v.

NATIONAL ARCHIVES AND RECORDS  
ADMINISTRATION; DAVID S. FERRIERO, in his  
official capacity as Archivist of the United States;  
U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT; and MATTHEW T. ALBENCE,  
in his official capacity as Acting Director of U.S.  
Immigration and Customs Enforcement,

*Defendants.*

Case No. 1:20-cv-739-APM

**STIPULATION**

Plaintiffs Citizens for Responsibility and Ethics in Washington (CREW), the American Historical Association (AHA), and the Society for Historians of American Foreign Relations (SHAHR), and Defendants National Archives and Records Administration (NARA), David S. Ferriero, U.S. Immigration and Customs Enforcement (ICE), and Matthew T. Albence, do  
HEREBY STIPULATE AND AGREE as follows:

1. Defendant ICE will issue a litigation hold instructing all relevant personnel not to destroy records under Schedule No. DAA-0567-2015-0013 (Detainee Records).
2. The preservation obligation created by this litigation hold supersedes any existing statutory or regulatory document-retention or document-disposition schedule, specifically including Schedule No. DAA-0567-2015-0013 itself.

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3. This litigation hold will remain in place while Plaintiffs' lawsuit is pending, inclusive of appeals.

Dated: March 25, 2020

Respectfully submitted,

/s/ Nikhel Sus

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