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SEP 9 - 2008

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON DEPUTY

NORTHWEST IMMIGRANT RIGHTS PROJECT
ET AL.

vs.

U.S. BUREAU OF CITIZENSHIP AND
IMMIGRATION SERVICES, ET AL.

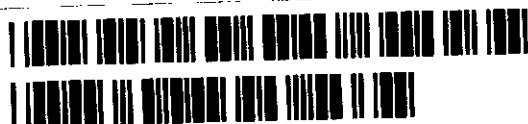
NO. 88-379R

JOINT STIPULATION OF
SETTLEMENT RE:
ATTORNEY'S FEES AND COSTS

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

1. Defendants will pay Plaintiffs \$1,775,000 in full settlement of all claims they may have for attorneys' fees, plus costs to be itemized and not to exceed \$35,000, whether under the Equal Access to Justice Act ("EAJA") 28 U.S.C. § 2412(d), or otherwise, provided that the Court approves the stipulation for settlement of the merits filed concurrently herewith, and final judgment is entered not subject to appeal or termination. In the event the Court declines to approve the stipulation for settlement of the merits filed concurrently herewith, this stipulation shall be null and void.

2. Attorneys fees and costs under this agreement shall be made payable to Gibbs, Houston & Pauw, 1000 Second Ave. Suite 1600, Seattle, WA 98104, and such payment will release Defendants from all payment obligations to Plaintiffs under EAJA and any other applicable law or regulation.



88-CV-00379-PET

Anthony W. Norwood
U.S. Department of Justice
P.O. Box 878, Ben Franklin Station
Washington, DC 20044
202-616-4883

Counsel for Defendants

Dated: May 27, 2008

Robert H. Gibbs, Esq.
Robert Pauw, Esq.
Gibbs Houston Pauw
1000 Second Ave. Suite 1600
Seattle, WA 98104

Counsel for Plaintiffs

Dated: 5/28/80

ORDER

IT IS SO ORDERED.

Dated: 9/9, 2008.

HONORABLE JAMES L. ROBERT
UNITED STATES DISTRICT JUDGE