

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

THE NATIONAL SECURITY ARCHIVE,)
)
Plaintiff,)
)
v.)
)
CENTRAL INTELLIGENCE AGENCY,)
et al.,)
)
Defendants.)

No. 06-CV-1080 (GK)

STIPULATION AND SETTLEMENT AGREEMENT
FOR ATTORNEYS' FEES AND COSTS

With respect to the lawsuit captioned National Security Archive (the "Archive") v. Central Intelligence Agency ("CIA"), et al., CV 06-1080 (D.D.C.), Plaintiff the Archive and Defendants (also referred to herein as the "CIA"), through their undersigned counsel, enter into this Stipulation and Settlement Agreement for Attorneys' Fees and Costs for the sole purpose of paying Plaintiff's claim for attorneys' fees, expenses and costs generated in connection with the above-referenced litigation.

The parties agree as follows:

1. On or before December 31, 2008, the CIA will pay to the Account of Plaintiff's attorneys, Wilmer Cutler Pickering Hale and Dorr, LLP, the amount of \$350,000 to cover attorneys' fees, expenses and costs of all counsel pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552(a)(4)(E). This payment is full and final payment for all attorneys' fees, expenses and costs generated in this lawsuit, and is inclusive of any interest.
2. Upon receipt of payment pursuant to Paragraph 1 above, Plaintiff hereby releases Defendants from any past, present, or future claims for attorneys' fees, expenses, or costs in connection with

Attachment A

C. A. 04-0814

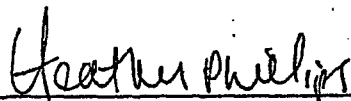
this litigation, except for any future claims arising from any future litigation to enforce the injunction issued by the Court in this lawsuit.

3. In making this payment, no party is making an admission of liability or fault to any other party, and this Agreement shall not be construed as an admission of liability or fault. This Settlement of Attorneys' Fees and Costs will not be used in any manner to establish liability for fees, amounts, or hourly rates, in any other case or proceeding.

4. In light of this Stipulation and Settlement, the deadline for the Archive to submit an application for attorneys' fees, expenses, or costs in this lawsuit is suspended and, upon receipt of payment pursuant to paragraph 1 above, all issues concerning attorneys fees, expenses and costs generated in this lawsuit shall be deemed to be finally resolved.

Dated: December 11, 2008

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Dated: December 11, 2008

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PATRICK J. CAROME

Attorney for Plaintiff

SO ORDERED:

United States District Judge

December __, 2008