

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

PUBLIC RECORD MEDIA, LLC,)	
)	
Plaintiff,)	
)	
v.)	CASE 0:12-cv-1225-MJD/AJB
)	
U.S. DEPARTMENT OF JUSTICE,)	JOINT STIPULATION OF
)	DISMISSAL
Defendant)	
_____)	

Having considered the Declaration of John Bies, filed by Defendant US Department of Justice (“Defendant”) on September 19, 2012, attached as Exhibit B to Defendant’s Motion for Summary Judgment of the same date, wherein Mr. Bies, on behalf of Defendant, declares that there exist no records responsive to the portion of Plaintiff Public Record Media’s (“Plaintiff”) FOIA request at issue in this case, Plaintiff has offered to voluntarily dismiss this action. Defendant has agreed. Therefore, Plaintiff and Defendant, acting by and through their undersigned attorneys, jointly stipulate to the dismissal of this action with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

Plaintiff intends to seek attorney’s fees. The parties therefore stipulate to entry of an order as follows:

1. Further proceedings on the merits are no longer necessary.
2. A separate statement of intent pursuant to Local Rule 54.3(b)(2) will not be required to preserve Plaintiff’s motion to seek a fee award.
3. Plaintiffs shall submit a motion for fees and expenses on or before November 5, 2012;

4. Defendant may respond to that motion on or before November 30, 2012;
5. Plaintiff may file a reply on or before December 14.

Dated: October 18, 2012

Respectfully submitted,

/s/Jonathan Haines

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