

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

)	
J.D., on behalf of herself and others similarly)	
situated, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	No. 17-cv-02122-TSC
v.)	
)	
ALEX M. AZAR, <i>et al.</i> ,)	
)	
Defendants.)	
)	

JOINT STIPULATION OF DISMISSAL WITHOUT PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties, by and through their undersigned counsel, hereby jointly stipulate and agree that the above-captioned case shall be, and is hereby, dismissed without prejudice, subject to the following conditions:

1. Defendants’ adoption of the revised policy on Medical Services Requiring Heightened ORR Involvement, attached hereto as Exhibit A, and communication of this revised policy to all Office of Refugee Resettlement (“ORR”) federal field officers and ORR-funded shelters housing unaccompanied immigrant minors (hereinafter “UACs” or “minors”).

2. Defendants shall notify Plaintiffs’ counsel at least fourteen (14) calendar days in advance of making any change to the Medical Services Requiring Heightened ORR Involvement policy, Exhibit A, or to any other relevant ORR policy or practice, as it relates to a minor’s access to non-directive options counseling, including abortion counseling, state judicial bypass proceedings, and abortion, and/or to the communication of information about a minor’s pregnancy and/or abortion decision to third parties, including, but not limited to, sponsors, prospective sponsors and parents, unless an emergency or applicable law makes

providing fourteen (14) days' notice impracticable, in which case Defendants shall provide notice as soon as possible. This notification requirement will remain in place for two years from the date of filing this Joint Stipulation with the Court.

3. Defendants shall require all ORR-funded shelters to post the Know Your Rights notice, attached hereto as Exhibit B, on all housing bulletin boards in both English and Spanish, adjacent to the notice required by the Prison Rape Elimination Act ("PREA"), 34 U.S.C. 30301 *et seq.*
4. Defendants shall pay Plaintiffs' counsel \$336,710.19 in fees and costs for this matter. Plaintiffs' counsel agrees to cooperate with Defendants' counsel in promptly providing additional reasonable information needed for requesting payment and transmission of funds. The parties agree that this Joint Stipulation shall resolve all claims for attorneys' fees and costs accrued as of the time of this Joint Stipulation.
5. This Joint Stipulation shall be binding upon and inure to the benefit of the parties hereto and their respective successors in office, officers, agents, servants, employees, attorneys, and anyone acting in concert with them.

September 29, 2020

Respectfully submitted,

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