IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARILYN KEEPSEAGLE, et al., Plaintiffs, v. TOM VILSACK, Secretary, United States Department of Agriculture, Defendant.	Civil Action No. 1:99CV03119 (EGS) Judge: Emmet G. Sullivan Magistrate Judge: Alan Kay

PLAINTIFFS' UNOPPOSED MOTION TO MODIFY THE SETTLEMENT AGREEMENT CY PRES PROVISIONS

Plaintiffs respectfully submit Plaintiffs' Unopposed Motion to Modify the Settlement Agreement's Cy Pres Provisions ("Motion"). As described in the accompanying Memorandum of Points and Authorities in Support of Plaintiffs' Motion, the parties have reached an agreement on a proposed Addendum to the Settlement Agreement that serves to modify the cy pres provisions of the Settlement Agreement. While the cy pres funds would go to non-profit organizations serving Native American farmers and ranchers under both the original agreement and the proposed Addendum, changes in the mechanism for distributing funds, and refinement in the eligible groups, will better accomplish the aims of the original agreement.

Counsel for defendants have authorized the undersigned to represent to the Court that defendants do not oppose the relief requested in this motion, although they do not necessarily agree with all characterizations and arguments in the memorandum filed in support of this motion.

September 24, 2014

Respectfully submitted,

By /s/ Joseph M. Sellers
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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of September, 2014, the foregoing was served via the Court's ECF system, which will cause an electronic copy to be sent to all counsel of record in the case.

Respectfully submitted,

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