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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

\_\_\_\_\_)  
PUBLIC CITIZEN, INC., *et al.*)  
                                  *Plaintiffs,*)  
                                  v.)  
ERIC H. HOLDER, JR.,) *Defendant.*

No. CV 08-0833 (MHP)

**PLAINTIFFS' STIPULATION OF  
DISMISSAL WITH PREJUDICE**

1 In the above-captioned action, Plaintiffs brought suit against the Attorney General alleging  
2 that the Department of Justice (DOJ) had violated the Administrative Procedure Act by failing to:  
3 (1) establish a commencement date for the monthly reporting to the National Motor Vehicle Title  
4 Information System (NMVTIS) of vehicle-history information by insurance carriers and junk and  
5 salvage yard operators; (2) establish by regulation procedures to report that information; and (3)  
6 provide NMVTIS access to prospective car buyers.

7 On September 30, 2008, the Court granted Plaintiffs' Motion for Summary Judgment and  
8 ordered DOJ to: (1) provide instant and reliable consumer access to all reasonably necessary  
9 information present in NMVTIS no later than January 30, 2009; (2) publish a final rule establishing  
10 the procedures for reporting by insurance carriers and junk and salvage yards no later than January  
11 30, 2009; and (3) establish a commencement date for that reporting no later than March 31, 2009.

12 The parties jointly inform the Court that dismissal of this case is appropriate at this time.  
13 Accordingly, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the parties hereby jointly  
14 stipulate to the dismissal of this action with prejudice. The parties have reached a separate  
15 settlement with respect to costs and fees.

16 /s/ Peter D. Leary  
17 PETER D. LEARY  
18 Counsel for Defendant

16 /s/ Deepak Gupta  
17 DEEPAK GUPTA  
18 Counsel for Plaintiffs

19 I, Deepak Gupta, as the electronic filer, attest that Peter Leary, whose name appears above,  
20 has concurred in this filing.

21 /s/ Deepak Gupta  
22 DEEPAK GUPTA

23  
24 7/15/2010

