

LODGED

CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW

Carlos Holguín
Peter A. Schey
Charles Song
256 South Occidental Boulevard
Los Angeles, CA 90057
Telephone: (213) 388-8693; Fax: (213) 386-9484

RECEIVED 10 11 9:09
U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.

LATHAM & WATKINS
Steven Schulman
555 Eleventh St., NW, Suite 1000
Washington, DC 20004
Telephone: (202) 637-2184

Of counsel:

YOUTH LAW CENTER
Alice Bussiere
417 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: (415) 543-3379 x 3903

Attorneys for plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JENNY LISETTE FLORES, et al ,)	Case No. CV 85-4544-RJK(Px)
)	
Plaintiffs,)	STIPULATION EXTENDING
)	SETTLEMENT AGREEMENT AND FOR
-vs-)	OTHER PURPOSES; AND ORDER
)	THEREON
JANET KING, Attorney General)	
of the United States, et al.)	
)	
Defendants)	

...

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS HEREBY STIPULATED by and between the parties as follows:

1. Paragraph 40 of the Stipulation filed herein on January 17, 1997, is modified to read as follows:

~~“All terms of this Agreement shall terminate the earlier of five years after the date of final court approval of this Agreement or three years after the court determines that the INS is in substantial compliance with this Agreement, 45 days following defendants’ publication of final regulations implementing this Agreement~~
~~except that~~ Notwithstanding the foregoing, the INS shall continue to house the general population of minors in INS custody in facilities that are state-licensed for the care of dependent minors.”

///

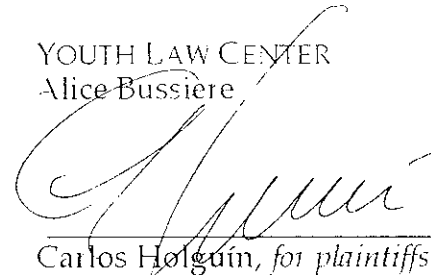
1 2 For a period of six months from the date this Stipulation is filed, plaintiffs shall not
2 initiate legal proceedings to compel publication of final regulations implementing this
3 Agreement. Plaintiffs agree to work with defendants cooperatively toward resolving
4 disputes regarding compliance with the Settlement. The parties agree to confer regularly no
5 less frequently than once monthly for the purpose of discussing the implementation of and
6 compliance with the settlement agreement. However, nothing herein shall require plaintiffs
7 to forebear legal action to compel compliance with this Agreement where plaintiff class
8 members are suffering irreparable injury.

9 Dated: December 7, 2001.

CENTER FOR HUMAN RIGHTS &
CONSTITUTIONAL LAW
Carlos Holguín
Peter A. Schey

LATHAM & WATKINS
Steven Schulman

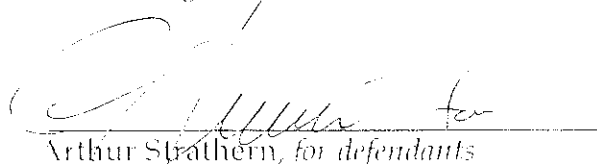
YOUTH LAW CENTER
Alice Bussiere



Carlos Holguín, for plaintiffs.

17 Dated: December 7, 2001

Arthur Strathern
Office of the General Counsel
U.S. Immigration & Naturalization Service



Arthur Strathern, for defendants
Per fax authorization

24 IT IS SO ORDERED

25 Dated: December _____ 2001

UNITED STATES DISTRICT JUDGE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

2 For a period of six months from the date this Stipulation is filed, plaintiffs shall not initiate legal proceedings to compel publication of final regulations implementing this Agreement. Plaintiffs agree to work with defendants cooperatively toward resolving disputes regarding compliance with the Settlement. The parties agree to confer regularly no less frequently than once monthly for the purpose of discussing the implementation of and compliance with the settlement agreement. However, nothing herein shall require plaintiffs to forebear legal action to compel compliance with this Agreement where plaintiff class members are suffering irreparable injury.

Dated: December 7, 2001.

CENTER FOR HUMAN RIGHTS &
CONSTITUTIONAL LAW
Carlos Holguín
Peter A. Schey

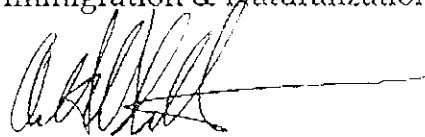
LATHAM & WATKINS
Steven Schulman

YOUTH LAW CENTER
Alice Bussiere

Carlos Holguín, *for plaintiffs*

Dated: December 7, 2001.

Arthur Strathern
Office of the General Counsel
U.S. Immigration & Naturalization Service



Arthur Strathern, *for defendants*
Per fax authorization

IT IS SO ORDERED

Dated: December 7, 2001.

UNITED STATES DISTRICT JUDGE

1 PROOF OF SERVICE BY MAIL.

2 I, Carlos Holguin, declare and say as follows:

3 1 I am over the age of eighteen years and am not a party to this action. I am
4 employed in the County of Los Angeles, State of California. My business address is 256
5 South Occidental Boulevard, Los Angeles, California 90057, in said county and state

6 2 On December 7, 2001, I served the attached STIPULATION on defendants in this
7 proceeding by placing a true copy thereof in a sealed envelope addressed to their attorneys
8 of record as follows:

9 Arthur Strathern
10 Office of the General Counsel
11 U.S. Immigration & Naturalization Service
12 425 I St. N.W.
13 Washington, DC 20536

14 and by then sealing said envelope and depositing the same, with postage thereon fully
15 prepaid, in the mail at Los Angeles, California; that there is regular delivery of mail between
16 the place of mailing and the place so addressed.

17 I declare under penalty of perjury that the foregoing is true and correct

18 Executed this 7th day of December, 2001, at Los Angeles, California

19
20
21
22
23
24
25
26
27
28

