

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

Plaintiff

Defendants

**SETTLEMENT AGREEMENT ON PLAINTIFF'S MOTION FOR PRELIMINARY
INJUNCTION REGARDING THE LASALLE ICE PROCESSING CENTER**

A. INTRODUCTION AND PROCEDURAL PROVISIONS

inter alia

B. DEFINITIONS OF TERMS IN THIS AGREEMENT

C. TERMS OF SETTLEMENT

D. ALTERNATIVE DISPUTE RESOLUTION

**E. DISPOSITION OF MOTION FOR PRELIMINARY INJUNCTION AND OTHER
INJUNCTIVE RELIEF**

F. ATTORNEYS' FEES AND COSTS

G. ADMISSION OF LIABILITY

H. FORCE MAJEURE DELAYS

I. MODIFICATION OF AGREEMENT

J. JOINTLY PREPARED

K. MUTUAL EXCLUSIVITY OF PROVISIONS

O. SUNSET PROVISION

P. COUNTERPARTS

Q. MISCELLANEOUS PROVISIONS

R. EFFECTIVE DATE

/s/ Jamila Johnson

/s/ Daniel P. Schaefer

