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1 CENTER FOR HUMAN RIGHTS & CONSTITUTIONAL LAW

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19 *Attorneys for plaintiffs*

20 UNITED STATES DISTRICT COURT  
21 CENTRAL DISTRICT OF CALIFORNIA

22 JENNY LISETTE FLORES, et al.,

23 Plaintiffs,

24 -vs-

25 JANEI RENO, Attorney General

26 of the United States, et al.,

27 Defendants.

Case No. CV 85-4544-RJK(Px)

STIPULATION EXTENDING  
SETTLEMENT AGREEMENT AND FOR  
OTHER PURPOSES; AND ORDER  
THEREON.

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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."

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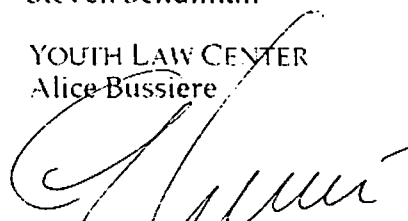
1           2. For a period of six months from the date this Stipulation is filed, plaintiffs shall not  
2 initiate legal proceedings to compel publication of final regulations implementing this  
3 Agreement. Plaintiffs agree to work with defendants cooperatively toward resolving  
4 disputes regarding 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  
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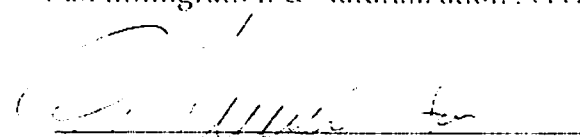
YOUTH LAW CENTER  
Alice Bussiere



\_\_\_\_\_  
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 UNRECORDED.

25 Dated: December \_\_\_\_, 2001.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

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  
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9 Dated: December 7, 2001.

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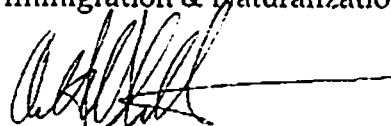
LATHAM & WATKINS  
 Steven Schulman

YOUTH LAW CENTER  
 Alice Bussiere

18 Dated: December 7, 2001.

\_\_\_\_\_  
 Carlos Holguín, *for plaintiffs.*

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



\_\_\_\_\_  
 Arthur Strathern, *for defendants.*  
 Per fax authorization

25 IT IS SO ORDERED.

26 Dated: December 7, 2001.

\_\_\_\_\_  
 UNITED STATES DISTRICT JUDGE

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PROOF OF SERVICE BY MAIL

I, Carlos Holguin, declare and say as follows:

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

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

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

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

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

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

