



U.S. Department of Justice

United States Attorney
*District of Massachusetts
Springfield Office*

*1550 Main Street
Springfield, Massachusetts 01103*

May 18, 1993

William Newman
Lesser, Newman, Souweine & Nasser
39 Main Street
Northampton, MA 01610

Re: Douglas Valentine v. Central Intelligence Agency
Civil Action No. 92-30025-F

Dear Bill:

Enclosed please find the CIA's proposed Agreement for Judgment. If the agreement is acceptable, please have it signed and return it to me for my signature and filing with the court. Please call me with any proposed revisions.

Very truly yours,

A. JOHN PAPPALARDO
United States Attorney

By:



KAREN L. GOODWIN
Assistant U.S. Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOUGLAS VALENTINE,)
)
 Plaintiff,)
)
 v.) Civil Action No.
) 92-30025-F
 CENTRAL INTELLIGENCE AGENCY,)
)
 Defendant.)

AGREEMENT FOR JUDGMENT

The plaintiff, Douglas Valentine, and the defendant, the Central Intelligence Agency ("CIA"), agree that a judgment shall be entered in this action as follows:

1. The following portions of documents 14, 30 and 36, shall be produced to the plaintiff within 15 days of the entry of this Agreement for Judgment:

Document 14: The material beginning with the third full sentence of the third paragraph (starting with the words, "You have") through the end of that paragraph (ending with the word "matter");

Document 30: The portion of the fifth full paragraph (beginning "I have" and ending "Valentine"), and the second to the last paragraph, with the exception of the names contained in the last sentence of that paragraph; and

Document 36: The last three paragraphs (beginning with "due to" and ending with "good work"), except for the specific names contained in the second to the last paragraph.

2. The remaining documents shall be withheld by the CIA.
3. The plaintiff reserves his right to petition the court for attorneys fees and the CIA reserves its right to oppose any

such petition. The plaintiff shall have 30 days from the entry of this Agreement for Judgment to file any application for attorneys fees and the CIA shall have 30 days from the date plaintiff files his application to file its opposition to said application. The court reserves jurisdiction in this action to render a decision on plaintiff's application for attorney's fees.

Respectfully submitted,

THE CENTRAL INTELLIGENCE AGENCY

A. JOHN PAPPALARDO
United States Attorney

Dated:

By:

Karen L. Goodwin
Assistant U.S. Attorney
1550 Main Street
Springfield, Massachusetts
413-785-0235

THE PLAINTIFF
DOUGLAS VALENTINE,

Dated:

By:

William C. Newman
CIVIL LIBERTIES UNION OF
MASSACHUSETTS
Western Regional Office
39 Main Street
Northampton, MA 01060
413-586-9115

Dated:

By:

Douglas Valentine
136 Captain Road
Longmeadow, MA 01106

APPROVED AND SO ORDERED

Dated:

FRANK H. FREEDMAN
Senior U.S. District Judge

FILED IN CLERK'S

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MAY 13 3 52 PM '93

DOUGLAS VALENTINE,)
)
 Plaintiff,)
)
 v.)
)
 CENTRAL INTELLIGENCE AGENCY,)
)
 Defendant.)

Civil Action No.
92-30025-F

DOCKETED

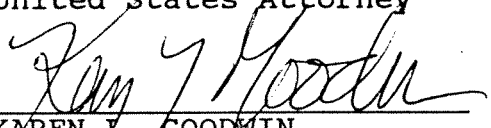
MOTION TO EXTEND TIME TO SUPPLEMENT VAUGHN INDEX
(Assented to)

The defendant, the Central Intelligence Agency ("CIA"), by its attorney, A. John Pappalardo, United States Attorney for the District of Massachusetts, moves to extend until May 27, 1993, the deadline for supplementing its Vaughn index. As grounds for this motion, the defendant states that the parties have reached a settlement in principal and are discussing the details of the settlement. Counsel for plaintiff assents to this extension.

Respectfully submitted,

A. JOHN PAPPALARDO
United States Attorney

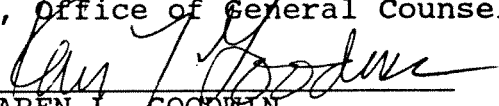
By:


KAREN L. GOODWIN
Assistant U.S. Attorney
1550 Main Street
Springfield, MA 01103
(413) 785-0269

DATED: May 13, 1993

CERTIFICATE OF SERVICE

I, KAREN L. GOODWIN, Assistant U.S. Attorney, do hereby certify that I have served a copy of the foregoing, to William C. Newman, Esquire, 39 Main Street, Northampton, MA 01618; Douglas Valentine, 136 Captain Road, Longmeadow, MA; and Thomas Goodread, Esquire, Central Intelligence Agency, Office of General Counsel, Washington, DC 20505.


KAREN L. GOODWIN

DOCKETED

5/17/93
allowed Friedman, J.J.
By the Court
John C. Stuckert, Deputy Clerk