IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

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)	CIVIL ACTION FILE NO.
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STIPULATION TO RESOLVE OPEN ISSUES

The Parties have reviewed and considered the Court's Order [Doc. 55] on various motions filed by the Parties. In the Order, the Court dismissed Plaintiffs' claims except for Plaintiff Raissi's Privacy Act claims. The Court found that there was a violation of the Privacy Act but that it was indeterminate who the liable Defendant(s) is(are) and what the damages for such violation are. The Court therefore left these two issues for trial.

The Parties desire to avoid the expense of trial to decide these issues, while

preserving their rights to appeal the decisions of the Court in the Order. The Parties therefore stipulate that, IF there was a violation of the Privacy Act, Defendant Metropolitan Atlanta Rapid Transit Authority ("MARTA") was liable for that violation. The Parties further stipulate that, IF there was a violation of the Privacy Act, the damages awardable to Plaintiffs are \$1,000. The Parties further stipulate that expungement of Plaintiff Raissi's SSN from MARTA's records is an additional appropriate remedy IF there was a violation of the Privacy Act.

Because the Parties believe all claims before the Court have now been fully decided either by the Order or by this Stipulation, and the Court can and should enter a final judgment in the case consistent with the Order and this Stipulation.

Both Parties specifically preserve their rights to appeal any and all adverse decisions contained in the Court's Order, and their rights to file any appropriate post-judgment motions.

Stipulated to by:

JOHN R. MONROE,

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