IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. ALLIED WASTE INDUSTRIES, INC., Defendant.	Supplemental to Civil Action No. 1:99 CV 01962 Date: May __, 2007 Civil Part I Judge

STIPULATION FOR ENTRY OF SETTLEMENT AGREEMENT AND ORDER

WHEREAS Plaintiff United States of America filed a Petition for an Order to Show Cause Why Defendant Allied Waste Industries, Inc. Should Not Be Found in Civil Contempt ("Petition to Show Cause") on May 8, 2007;

AND WHEREAS the United States and Allied Waste Industries, Inc. have agreed upon a resolution of this matter without any admission or determination of wrongdoing by Allied and without any findings or adjudication with respect to any issue of fact or law;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned parties that:

1. This Court has jurisdiction over the subject matter of this action and each of the parties to this action.

2. The proposed Settlement Agreement and Order in the form attached may be entered by the Court on the Court's own motion or the motion of the United States at any time, and without further notice to any party or any proceeding.

3. The parties' execution of this Stipulation and entry of the proposed Settlement Agreement and Order discharges, settles and constitutes a full release of all claims of the United States against Allied, as defined in Paragraph II(A) of the Modified Final Judgment entered in United States v. Allied Waste Industries, Inc. and Browning-Ferris Industries, Inc., No. 1:99 CV 01962 (D.D.C. 2000) ("Modified Final Judgment"), and any former employees, arising out of the alleged violation of Paragraph VII(A) of the Modified Final Judgment, as alleged in the Petition to Show Cause.

4. Neither this Stipulation nor the proposed Settlement Agreement and Order shall be construed to preclude the United States from bringing an action against Allied for any violation of the Modified Final Judgment other than the alleged violation described in Paragraph 3, above.

5. In the event the United States withdraws its consent, or if the Settlement Agreement and Order are not entered pursuant to this Stipulation, this Stipulation shall be of no effect whatever, the making of it shall be without prejudice to any party in this or any other proceeding, and it shall not thereafter be used in this or any other action, or for any other purpose.

Dated: May 8, 2007

ALLIED WASTE INDUSTRIES, INC.

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