

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CRISTINA NICHOLE IGLESIAS
(a.k.a. CRISTIAN NOEL IGLESIAS),

Plaintiff,

v.

IAN CONNORS, *et al.*,

Defendants.

Case No. 19-cv-00415-RJN

Judge Nancy J. Rosenstengel

JOINT STIPULATION TO DISMISS CERTAIN CLAIMS

Plaintiff and Defendants hereby stipulate that Plaintiff will dismiss her claims under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), against Michael Carvajal, Chris Bina, Ian Connors, Alix McLearen, Thomas Scarantino, Dan Sproul, Dr. Jeffery Allen, and Donald Lewis in their individual capacity, but not in their official capacity, in exchange for the agreement and confirmation of the Bureau of Prisons (“BOP”), which BOP hereby provides, that BOP is capable of providing all of the relief Plaintiff seeks in her Second Amended Complaint and that Defendants will not argue that maintaining *Bivens* claims against any of the individual defendants is a prerequisite to Plaintiff obtaining that requested relief.

Defendants reserve all rights to seek the dismissal of official-capacity claims against current and former BOP defendants, as well as any other remaining claims, at the appropriate time. Except as explicitly provided above, nothing herein shall constitute a waiver of any defense or argument that could be raised by Defendants.

Dated: June 16, 2021

Respectfully Submitted,

/s/ Joshua E. Gardner

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