

# EXHIBIT B

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

NATIONAL VETERANS LEGAL )  
SERVICES PROGRAM, NATIONAL )  
CONSUMER LAW CENTER, and )  
ALLIANCE FOR JUSTICE, for themselves )  
and all others similarly situated, )

*Plaintiffs,*

Civil Action No. 16-0745 (PLF)

v.

UNITED STATES OF AMERICA, )

*Defendant.*

**STIPULATION AND FIRST AMENDMENT  
TO CLASS ACTION SETTLEMENT AGREEMENT**

Through this Stipulation and Amendment, the parties agree to the following modification to the Class Action Settlement Agreement, executed by counsel for Plaintiffs on July 27, 2022 and counsel for Defendant on July 12, 2022 (the "Agreement").

Paragraph 3 of the Agreement shall be replaced with the following language:

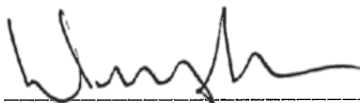
- 3. "Plaintiffs" or "Class Members," as used in this agreement, are defined to include all persons or entities who paid PACER fees between April 21, 2010, and May 31, 2018 ("the Class Period") regardless of when such persons or entities used the PACER system. Excluded from that class are: (i) persons or entities that have already opted out; (ii) federal agencies; and (iii) Class Counsel.

In addition, the parties agree that the phrases "who paid PACER fees between [date x] and [date y]" and "who paid fees for use of PACER between [date x] and [date y]," as used in paragraphs 3 and 4 of the Agreement, refer to the payment of PACER fees in the specified period rather than the use of PACER in the specified period. The parties further agree that each specified period in those paragraphs includes both the start and end dates unless otherwise specified.

Finally, in paragraph 27 of the Agreement, the parties agree that the reference to “60 days” shall be changed to “75 days.”

The remainder of Agreement remains unchanged by this Stipulation and Amendment.

AGREED TO ON BEHALF OF PLAINTIFFS:



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*Attorneys for Plaintiffs*


Date: September 29, 2022

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By:

  
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9-29-22

Dated

*Attorneys for the United States of America*