

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

SAADIQ LONG,

Plaintiff,

v.

CHIEF WADE GOURLEY, Chief,
Oklahoma City Police Department, in
his official capacity only;

OFFICER BRADLEY (first name
unknown), Oklahoma City Police
Department, in his individual capacity;

OFFICER DUSTIN FULTON,
Oklahoma City Police Department, in
his individual capacity;

OFFICER MULLINS (first name
unknown), Oklahoma City Police
Department, in his individual capacity;

and

UNKNOWN OFFICERS 1-14,
Oklahoma City Police Department, in
their individual capacities;

Defendants.

Case No. 5:23-cv-00080

Hon. Jodi W. Dishman

Magistrate Judge Gary M. Purcell

PARTIES' JOINT STIPULATION

On January 26, 2023, Plaintiff filed a Motion for Temporary Restraining Order and Preliminary Injunction against Chief Gourley in his official capacity, seeking an injunction against the Oklahoma City Police Department from taking law

enforcement action on the basis of a person's status on the FBI's terror watchlist. *See* Dkt. 7 at 20. On January 30, this Court ordered the parties to meet and confer regarding the motion. *See* Dkt. 10. The parties thereafter met and conferred by telephone and email.

During that process, Plaintiff agreed to withdraw his motion in exchange for the following stipulations:

1. The Oklahoma City Police Department acknowledges that neither Saadiq Long nor any other person should be stopped by officers based solely on that individual's KST File status in the NCIC.
2. The Oklahoma City Police Department has taken steps to ensure that its officers will not stop Saadiq Long or any other person based solely on that individual's KST File status in the NCIC.
3. Specifically, on January 31, 2023, the Oklahoma City Police Department issued instructions to all officers that neither Saadiq Long nor any other person listed in the KST file in the NCIC should be stopped based solely on the list.
4. Saadiq Long will continue to drive normally, making a good faith effort to comply with relevant traffic laws and regulations.

Dated: February 1, 2023.

Respectfully submitted,

Kenneth Jordan
Municipal Counselor

/s/ Katie Goff

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s/ Veronica Laizure

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**Admission to the bar of this Court forthcoming.*

*+Mr. Abbas is licensed in Virginia, not D.C.
Practice limited to federal matters.*