UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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ROGER HALL, et al.,	
Plaintiffs,	
v.	
CENTRAL INTELLIGENCE AGENCY,	
Defendant.	

Civil Action No. 04-0814 (RCL)

JOINT STATUS REPORT

Defendant, the Central Intelligence Agency ("CIA" or "Agency"), and Plaintiffs Roger Hall ("Hall"), Studies Solutions Results, Inc., ("SSRI") and Accuracy in Media, Inc., ("AIM") jointly submit this status report to apprise the Court of the status of the parties' discussions regarding attorneys' fees in this Freedom of Information Act ("FOIA"), Privacy Act ("PA") and JFK Records Act matter. Accordingly, the parties state as follows:

1. On November 30, 2020, the Court ordered the parties to meet and confer regarding attorneys' fees and to file a status report on January 29, 2021, addressing the potential for settlement and proposing a schedule for any fee litigation that may be required. *See* ECF. No. 353.

2. On January 27, 2021, counsel for AIM, John Clarke, sent the CIA an itemization of his hours.

3. On January 27, 2021, counsel for Plaintiffs Hall and SSRI, James H. Lesar, sent a preliminary itemization of his hours, and indicated he was gathering additional billing statements for himself and others who worked on the case. Mr. Lesar intended to provide the CIA with an updated itemization by the end of the week of February 5, 2021.

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4. On February 12, 2021, CIA reached out to Mr. Lesar regarding the status of the updated itemizations as the Agency had not yet received them.

5. On February 13, 2021, Mr. Lesar informed CIA he was not yet able to provide the updated itemizations due to a number of health issues and cases with upcoming deadlines.

6. In order to provide time for Mr. Lesar and others to provide updated itemizations so the parties can engage in negotiations regarding a reasonable attorneys' fees award, additional time is needed.

7. Accordingly, based on the above, the parties respectfully propose that they provide another update by **March 29, 2021**, on the parties' discussion pertaining to the potential for settlement and proposing a schedule for any fee litigation if necessary. A proposed order is attached.

Dated: March 1, 2021

Respectfully submitted,

<u>/s/James H. Lesar</u> James H. Lesar, Bar No. 114413 Counsel for plaintiffs Roger Hall and Studies Solutions Results, Inc. 930 Wayne Avenue Unit 1111 Silver Spring, MD 20910 (301) 328-5920 jhlesar@gmail.com

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