

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LOIS MOORE, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	
)	Civil Action No. 20-1735 (RCL)
NATIONAL ARCHIVES AND)	
RECORDS ADMINISTRATION,)	
)	
Defendant.)	
_____)	

JOINT MOTION FOR ENLARGEMENT OF TIME TO FILE JOINT STATUS REPORT

COMES NOW Defendant National Archives and Records Administration ("NARA"), together with Plaintiffs Lois Moore, Robert Moore, Jana Orear, Christianne O'Malley, Mark Sauter, John Zimmerlee, and the POW Investigative Project, Inc., under Rule 6(b) of the Federal Rules of Civil Procedure, and jointly seek a 30-day enlargement of time within which to provide the Court with their Joint Status Report.

Memorandum of Points and Authorities

1. This matter arises out of a FOIA request Plaintiffs submitted to NARA, dated April 20, 2020, involving 47 separate subparts. *See* Compl. ¶¶ 10-12. Plaintiffs filed the Complaint on June 25, 2020, ECF No. 1, and Defendant filed an Answer on September 14, 2020, ECF No. 5.

2. By Order of the Court entered on December 9, 2020, the Court granted plaintiffs' motion seeking until December 21 for the parties to file their Joint Status Report. That extension of time was occasioned by plaintiffs being unaware of NARA's lengthy November 5 letter setting forth its positions regarding most of plaintiffs' FOIA Requests.

3. On December 15, plaintiffs responded to all four of NARA's letters, dated September 16, September 30, November 3, and November 5. Plaintiff's December 15 letter asks a number of questions to the three authors of NARA's correspondence, in an effort to narrow the issues. NARA needs additional time to respond.

4. The parties seek to narrow the issues, so that the next Joint Status Report may be fulsome, to include what matters that the parties do, and do not, agree on. The parties believe that this approach would advance the ultimate resolution of the case.

WHEREFORE, Plaintiffs and Defendant respectfully pray that the Court grant the parties until December January 21, 2021, to submit their Joint Status Report.

Dated: December 18, 2020.

Respectfully submitted,

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