UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

LOIS MOORE, et al.,

Plaintiffs,

v.

Civil Action No. 20-1735 (RCL)

NATIONAL ARCHIVES AND RECORDS ADMINISTRATION,

Defendant.

JOINT STATUS REPORT

Pursuant to the Court's Minute Order dated February 24, 2021, Plaintiffs Lois Moore, Robert Moore, Jana Orear, Christianne O'Malley, Mark Sauter, John Zimmerlee, and the POW Investigative Project, Inc. ("Plaintiffs"), and Defendant the National Archives and Records Administration ("NARA") hereby provide the Court with the following Joint Status Report.

The parties continue to cooperate and discuss resolution and narrowing of the issues with regard to the FOIA request without the need for Court intervention. NARA has completed its searches, which encompassed three different NARA locations, and which has been impacted by the Covid-19 pandemic. In a letter dated December 14, 2020 from Plaintiff's counsel to Defendant, Plaintiff submitted several questions concerning the search for responsive records and NARA's letters to Plaintiff dated September 16, September 30, November 3, and November 5, 2020. Counsel for Defendant has responded to those questions and the parties are presently discussing Defendant's response and the issues raised in the parties' foregoing correspondence, in the hope of narrowing and clarifying the request and response. The parties hope to resolve any outstanding issues without the need for court intervention.

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In light of the above, the parties propose to continue their discussions and file a further status report on or before April 22, 2021, to update the Court on the progress being made and the status of the FOIA request.

Dated: March 22, 2021

Respectfully submitted,

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