

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

|                              |   |                                |
|------------------------------|---|--------------------------------|
| _____                        | ) |                                |
| ROGER HALL, <i>et al.</i> ,  | ) |                                |
|                              | ) |                                |
| Plaintiffs,                  | ) |                                |
|                              | ) |                                |
| v.                           | ) | Civil Action No. 04-0814 (RCL) |
|                              | ) |                                |
| CENTRAL INTELLIGENCE AGENCY, | ) |                                |
|                              | ) |                                |
| Defendant.                   | ) |                                |
| _____                        | ) |                                |

**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. To date, the CIA has not been provided an updated itemization.

4. The CIA will be shortly presenting settlement offers to Plaintiffs' counsels.

5. Accordingly, based on the above, the parties respectfully propose that they provide another update by **April 30, 2021**, on the parties' discussion pertaining to the potential for settlement and proposing a schedule for any fee litigation if necessary. (See separate report by Plaintiff Hall at Attachment A).

A proposed order is attached.

Dated: March 29, 2021

Respectfully submitted,

/s/ James H. Lesar

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](mailto:jhlesar@gmail.com)

/s/ John H. Clarke

John H. Clarke, Bar No. 388599  
Accuracy in Media, Inc.  
1629 K Street, NW  
Suite 300  
Washington, DC 20006  
(202) 344-0776  
Fax: (202)332-3030  
[johnhclarke@earthlink.net](mailto:johnhclarke@earthlink.net)

*Counsel for Plaintiffs*

CHANNING D. PHILLIPS, D.C. Bar #415793  
Acting United States Attorney

BRIAN P. HUDAK  
Acting Chief, Civil Division

By: /s/ Kathleene Molen

KATHLEENE MOLEN  
Assistant United States Attorney

555 4th Street, N.W.  
Washington, District of Columbia 20530  
(202) 803-1572  
[Kathleene.Molen@usdoj.gov](mailto:Kathleene.Molen@usdoj.gov)

*Counsel for Defendant*