

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

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ROGER HALL, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 04-0814 (RCL)
)	
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant.)	
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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 other who worked on the case. On April 12, 2021, Mr. Lesar provided additional

itemizations of his and Mr. Clarke's hours. Mr. Lesar has indicated that additional billing statements will be provided.

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 **May 28, 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: April 30, 2021

Respectfully submitted,

/s/ James H. Lesar

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