

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

LOIS MOORE, *et al.*,

*Plaintiffs,*

v.

NATIONAL ARCHIVES AND RECORDS  
ADMINISTRATION,

*Defendant.*

Civil Action No. 20-1735 (RCL)

**JOINT STATUS REPORT**

Pursuant to the Court's Minute Order entered on January 21, 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.

Undersigned counsel for Defendant recently joined the Office of the United States Attorney and substituted his appearance as counsel for Defendant on December 18, 2020.

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. 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 Plaintiff and Defendant continue to discuss the issues raised in the parties' foregoing correspondence and hope to resolve any outstanding issues.

In light of the above, the parties propose to continue their discussions and file a further status report on or before March 22, 2021, to update the Court on the progress being made and whether court intervention might be required.

Dated: February 22, 2021

Respectfully submitted,

/s/ John H. Clarke  
John H. Clarke  
Bar No. 388599  
1629 K Street, N.W.  
Suite 300  
Washington, D.C. 20006  
(202) 344-0776  
john@johnclarkelaw.com

*Counsel for Plaintiffs*

MICHAEL R. SHERWIN  
Acting United States Attorney

BRIAN P. HUDAK  
Acting Chief, Civil Division

By: /s/ Thomas W. Duffey  
THOMAS W. DUFFEY  
Assistant United States Attorney  
555 Fourth Street, N.W.  
Washington, D.C. 20530  
(202) 252-2510  
Thomas.duffey@usdoj.gov

*Counsel for Defendant*