

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 dated March 23, 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. By letter dated December 14, 2020, Plaintiffs' counsel submitted several questions concerning the search for responsive records, NARA responded in letters on September 16, September 30, November 3, November 5, 2020, and by counsel by email on March 22, 2021.

Based on these communications, Plaintiffs are significantly narrowing the FOIA requests at issue, and are seeking further information regarding Defendant's responses related to its searches and search capabilities. The parties hope to resolve a number of outstanding issues without the need for court intervention.

In light of the above, the parties propose to continue their discussions and file a further status report on or before May 21, 2021, to update the Court on the progress being made and the status of the FOIA request.

Dated: April 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*

CHANNING D. PHILLIPS  
D.C. BAR NO. 415793  
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*