

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.	)	
_____	)	

CONSENT MOTION FOR ENLARGEMENT OF TIME TO FILE JOINT STATUS REPORT

COME NOW Plaintiffs Lois Moore, Robert Moore, Jana Orear, Christianne O’Malley, Mark Sauter, John Zimmerlee, and the POW Investigative Project, Inc. (“Plaintiffs”), under Rule 6(b) of the Federal Rules of Civil Procedure, and, with the consent of Defendant National Archives and Records Administration (“NARA”), respectfully seek a 14-day enlargement of time within which to provide the Court with their Joint Status Report.

Memorandum of Points and Authorities

1. This matter arises out of a FOIA request Plaintiffs submitted to NARA, dated April 20, 2020, involving 47 separate subparts. *See* Compl. ¶¶ 10-12. Plaintiffs filed the Complaint on June 25, 2020, ECF No. 1, and Defendant filed an Answer on September 14, 2020, ECF No. 5.

2. By Order of the Court entered on October 9, 2020, the Court directed the parties to file a Joint Status Report, by December 7, 2020. In preparation their input into the Report, plaintiffs reviewed NARA's correspondence dated September 16, September 30, and November 7, 2020. On Friday, December 4, the undersigned inquired to defense counsel about NARA's position regarding a number of plaintiffs' FOIA requests.

3. Upon some communications on the matter, on December 7, the parties discovered that plaintiffs had been unaware that, on November 5, NARA had emailed the undersigned a 14-page letter, setting forth its various positions regarding most of plaintiffs' FOIA Requests.

4. Due to this missed communication (through no fault of the government), plaintiffs need further time to review NARA's positions before apprising the Court of the progress of the case in the parties' Joint Status Report. The relief sought will likely advance a speedy resolution of this case.

WHEREFORE, Plaintiffs respectfully pray that the Court grant the parties until December 21, 2020, to submit their Joint Status Report.

Dated: December 7, 2020

Respectfully submitted,

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