

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

NATIONAL SECURITY ARCHIVE, )

Plaintiff, )

v. )

EXECUTIVE OFFICE OF THE )

PRESIDENT, et al., )

Defendants. )

Civil Action No. 07-1577 (HHK/JMF)

CITIZENS FOR ETHICS & )

RESPONSIBILITY IN )

WASHINGTON, )

Plaintiff, )

v. )

EXECUTIVE OFFICE OF THE )

PRESIDENT, et al., )

Defendants. )

Civil Action No. 07-1707 (HHK/JMF)

JOINT MOTION TO STAY CASES

All parties hereby jointly move the Court to stay these consolidated cases in order to provide the parties ample opportunity to explore whether the issues raised in these consolidated cases may be resolved through settlement rather than continued litigation. The parties have agreed to withdraw all pending motions and/or discovery requests, without prejudice to renew them. Plaintiff National Security Archive moves to have its Motion to Compel Production of the Administrative Record [Docket #97], filed January 8, 2009, withdrawn without prejudice to renew. Defendants move to withdraw their Motion to Dismiss [Docket #112], filed January 21, 2009, without prejudice to renew. The parties have agreed that any party may dissolve the stay

by filing a substantive motion or otherwise seeking the Court's assistance, and that administrative filings, such as notices of withdrawal or appearance, shall not affect the stay. The parties have agreed that they shall file a joint status report in three months and every three months thereafter to apprise the Court of the status of negotiations.

There is good cause to grant this motion and stay the case, as the parties have already begun to engage in discussions to resolve the issues raised in these cases through settlement, and more time is needed to conduct these discussions. The interests of justice will be furthered by allowing the parties ample time to discuss the possible resolution of these cases without further litigation. Scarce judicial resources will be conserved by allowing the parties to attempt to resolve these cases without judicial assistance. Because any party may dissolve the stay, no party is prejudiced by imposition of the stay.

Pursuant to Local Civil Rule 7(m), counsel for all parties have met and conferred, and all parties join in this motion.

Respectfully submitted this 30th day of March, 2009.

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[PROPOSED] ORDER STAYING CASES

Upon consideration of the Joint Motion to Stay Cases submitted by all parties to these consolidated cases, the applicable law, and the entire record herein, it is hereby

ORDERED, that the Joint Motion to Stay Cases is GRANTED; and it is further

ORDERED, that all outstanding motions in the above-captioned cases shall be withdrawn without prejudice to renew, including the Motion to Compel Production of the Administrative Record [97] and the Motion to Dismiss [112]; and it is further

ORDERED, that the above-captioned cases are STAYED to allow for settlement discussions among the parties; and it is further

ORDERED, that any party may dissolve the stay by filing a motion with the Court; and it is further

ORDERED, that the parties shall file a joint status report in three months apprising the Court of the status of settlement discussions, and for as long as the stay remains in place, shall file a joint status report every three months thereafter.

SO ORDERED.

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Signed by United States District Judge Henry H. Kennedy.