

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Archive moves to have its Motion to Compel Production of the Administrative Record [Docket #97], filed January 8, 2009, withdrawn without prejudice to renew.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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