

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

THE JAMES MADISON PROJECT, NOAH SHACHTMAN, and BETSY WOODRUFF,)
)
)
 Plaintiffs,)
)
 v.)
)
DEPARTMENT OF HOMELAND SECURITY,)
)
)
 Defendant.)
 _____)

Civil Action No. 17-1281

JOINT STATUS REPORT

In accordance with this Court’s Order of February 1, 2019, Plaintiffs, the James Madison Project, Noah Shachtman, and Betsy Woodruff (collectively, “Plaintiffs”), and Defendant U.S. Department of Homeland Security respectfully file the instant Joint Status Report as follows:

1. On February 1, 2019, this Court granted the parties’ Joint Motion to Enter Scheduling Order. Specifically, this Court ordered that the parties file a “status report setting forth their progress on an agreement concerning attorney fees and costs . . . by March 15, 2019.”
2. Since that time, the parties have conferred via email concerning a potential joint resolution on the issue of attorney fees and costs. The parties anticipate that they will be able to reach a final agreement on this issue.
3. However, Defendants require additional time to obtain final approval as to an award of attorney fees and costs.
4. Accordingly, the parties respectfully request an extension of time in which to reach a final agreement on the issue of attorney fees and costs in this matter. The parties propose that they be permitted to seek a joint resolution of this issue until April 19, 2019.

5. The parties propose that they file a further status report on April 19, 2019, updating the Court as to the status of negotiations, and if necessary, including a briefing schedule on this issue.

Dated: March 15, 2019

Respectfully submitted,

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