

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

CITIZENS FOR RESPONSIBILITY AND ETHICS IN WASHINGTON,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:07-cv-02236 (PLF)
)	
UNITED STATES DEPARTMENT OF HOMELAND SECURITY,)	
)	
Defendant.)	
)	

JOINT STATEMENT AND MOTION TO STAY LITIGATION

Pursuant to the Court’s Order dated July 28, 2008, plaintiff and defendant jointly file this Statement and Motion to Stay Litigation in the above-styled case. Plaintiff Citizens for Responsibility and Ethics in Washington (“CREW”) filed a Freedom of Information Act (“FOIA”) request with defendant United States Department of Homeland Security (“DHS”). In this litigation, CREW is alleging, *inter alia*, that DHS has failed to fulfill plaintiff’s request for records under the FOIA.

Defendant has now completed its processing of CREW’s request and the parties are working to narrow, if not eliminate, any further issues. In order to give the parties time to determine whether they can resolve this matter without further litigation, CREW and DHS respectfully request that this Court stay the instant litigation through August 29, 2008, by which time the parties will inform the Court of any outstanding issues that remain.

CONCLUSION

For the foregoing reasons, the parties respectfully request that the Court issue a stay of the instant litigation through August 31, 2008.

Respectfully submitted,

GREGORY G. KATSAS
Assistant Attorney General
ELIZABETH SHAPIRO
Civil Division, Federal Programs Branch

_____/s/
ANNE L. WEISMANN
D.C. Bar # 298190
MELANIE SLOAN
D.C. Bar # 434584
Citizens for Responsibility and
Ethics in Washington
1400 Eye Street, NW; Suite 450
Washington, D.C. 20005
Tel: (202) 408-5565
Counsel for Plaintiff

_____/s/
C. LEE REEVES
Trial Attorney
Civil Division, Federal Programs Branch
United States Department of Justice
20 Massachusetts Ave., N.W., Room 7109
Washington, D.C. 20530
Telephone: (202) 514-4805
Facsimile: (202) 616-8470
Email: lee.reeves@usdoj.gov
Attorneys for the United States of America

Dated: July 28, 2008