

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

CITIZENS FOR RESPONSIBILITY AND)	
ETHICS IN WASHINGTON,)	
)	
Plaintiff,)	CIVIL ACTION NO.
)	1:07-cv-00048-RBW
v.)	
)	
NATIONAL ARCHIVES AND RECORDS)	
ADMINISTRATION,)	
)	
Defendant.)	
)	

**JOINT MOTION FOR CORRECTION OF COURT ORDER
AND DEFERRAL OF COMPLIANCE DATE**

All parties, by their undersigned counsel, hereby respectfully request the correction of certain issues in relation to this Court's Order and Memorandum Opinion of September 29, 2008 [16, 17], as follows:

1. The Order does not address the status of four documents whose withholding or partial withholding the plaintiff continues to contest — specifically, Documents 18a, 46, 49, and 54.
2. Among the documents that the Order requires the defendant to submit for in camera review is Document 15a, whose withholding the plaintiff no longer contests.

Accordingly, the parties respectfully request the following:

- That the Order and Memorandum Opinion of September 29, 2008, be amended (a) to address, as the Court may see fit, the parties' dispute regarding Documents 18a, 46, 49, and 54, and (b) to omit Document 15a from the documents to be submitted for in camera review; and

- That defendant's deadline to comply with the Order be deferred until (a) 30 days after these matters are resolved, if the Court orders the submission of additional support for defendant's withholding of any of the documents listed in paragraph 1 above, or (b) 10 days after these matters are resolved, if the Court does not order the submission of any such additional support.

/s/ Anne L. Weismann

ANNE L. WEISMANN, D.C. Bar No. 298190
MELANIE SLOAN, D.C. Bar No. 434584

Citizens for Responsibility and Ethics
in Washington
1400 Eye Street, N.W., Suite 450
Washington, D.C. 20005
Telephone: (202) 408-5565
Facsimile: (202) 588-5020
E-mail: aweismann@citizensforethics.org

Dated: October 14, 2008

COUNSEL FOR PLAINTIFF

Respectfully submitted,

GREGORY G. KATSAS
Assistant Attorney General

JEFFREY A. TAYLOR
United States Attorney

ELIZABETH J. SHAPIRO, D.C. Bar 418925
Assistant Director

JOHN R. TYLER, D.C. Bar 297713
Senior Trial Counsel

/s/ W. Scott Simpson

W. SCOTT SIMPSON, Va. Bar 27487
Senior Trial Counsel

Attorneys, Department of Justice
Civil Division, Room 7210
Post Office Box 883
Washington, D.C. 20044
Telephone: (202) 514-3495
Facsimile: (202) 616-8470
E-mail: scott.simpson@usdoj.gov

Dated: October 14, 2008

COUNSEL FOR DEFENDANT