

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CARTER PAGE,

Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE,

Defendant.

Case No. 1:19-CV-03149-KBJ

JOINT STATUS REPORT

Pursuant to this Court's Order of May 26, 2020, Plaintiff Carter Page and Defendant the United States Department of Justice, through the undersigned counsel, hereby provide the following status report to the Court:

1. Dr. Page, then self-represented, filed this action on October 21, 2019. ECF 1. The government filed its Partial Motion to Dismiss and for Partial Summary Judgment on December 23, 2019. ECF 9 ("Motion").
2. On January 31, 2020, Dr. Page requested an extension of time to respond to the Motion. ECF 11. By Order of February 4, 2020, the Court extended the time for Dr. Page to respond to March 31, 2020. Dr. Page represents that he engaged the undersigned counsel thereafter.
3. In light of settlement discussions and other factors, including COVID-19, Dr. Page requested two additional extensions to respond to the government's Motion, most recently to July 29, 2020; the Court granted those motions. *See* Orders granting ECF 13 and ECF 14.
4. The parties made good faith efforts to resolve this case over several months, but were

unsuccessful. The parties do not expect to engage in further discussions before the Motion is resolved.

5. Dr. Page is considering seeking one further 30-day extension to the deadline. Counsel for the parties have not yet conferred about this motion.

Respectfully submitted,

ETHAN DAVIS
Acting Assistant Attorney General

MARCIA BERMAN
Assistant Director, Federal Programs Branch

/s/ Amy E. Powell
AMY E. POWELL
Senior Trial Counsel, Federal Programs Branch
Civil Division, Department of Justice
c/o U.S. Attorney's Office
150 Fayetteville St., Suite 2100
Raleigh, NC 27601
Phone: 919-856-4013
Email: amy.powell@usdoj.gov

Counsel for Defendant

/s/ Thomas M. Buchanan
Thomas M. Buchanan (D.C. Bar # 337907)
WINSTON & STRAWN LLP
1901 L Street NW
Washington, DC 20036
Tel: (202) 282-5787
Fax: (202) 282-5100
Email: tbuchana@winston.com

Counsel for Plaintiff

Dated: July 15, 2020

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2020, the foregoing notice was electronically filed and served on all counsel of record through the Court's CM/ECF system, in accordance with the Court's electronic case filing policies and procedures.

/s/ Thomas M. Buchanan
Thomas M. Buchanan
Counsel for Plaintiff