

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

ANNE PEARSE-HOCKER,	)	
	)	
Plaintiff,	)	
	)	No. 10-269 C
v.	)	Judge Edward J. Damich
	)	
THE UNITED STATES,	)	
	)	
Defendant.	)	
	)	

**JOINT STATUS REPORT**

In accordance with the Court’s February 17, 2011, Order, plaintiff Anne Pearse-Hocker and defendant, the United States, hereby submit this Joint Status Report, which addresses the parties’ specific progress and plans towards settlement. On February 17, 2011, the Court granted the parties a 61-day stay of proceedings in this case based on progress made in settlement discussions between the parties. During the subsequent stay, the parties have formulated drafts of a Settlement Agreement and a Stipulation for Entry of Judgment (to be filed with the court). As explained more fully below, the parties are actively working to complete these documents and, thus, are concurrently filing a Motion for Continuation of a Stay.

By agreement of the parties, defendant provided plaintiff with an initial draft of the settlement documents on March 14, 2011. The plaintiff then provided limited comments and edits to these drafts on April 15, 2011. Defendant’s counsel is now considering those edits along with personnel from the Smithsonian Institution. Based on plaintiff’s edits to the drafts, the parties agree that only a few outstanding issues remain to be resolved in order to finalize the Settlement Agreement: the parties have already agreed to mutually acceptable language for most

of the provisions of the Agreement. Likewise, there are no open issues remaining between the parties regarding the Stipulation.

Accordingly, the parties have filed, concurrently with this report, a motion for an additional 45-day stay of all proceedings in order to avoid the expense and time required to restart proceedings under the Court's schedule. As indicated in that motion, the parties believe that the requested stay will provide sufficient time for the parties to complete and execute a settlement agreement.

Respectfully submitted,

THOMPSON HINE LLP

Dated: April 18, 2011

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