

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 April 18, 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. In its Order, the Court granted the parties a 45-day continued stay of proceedings in this case based on progress made in settlement discussions between the parties. During this stay, the parties have worked to complete a Settlement Agreement and a Stipulation for Entry of Judgment (Stipulation). As explained below, the parties are close to completing these documents and executing a settlement, and thus, are concurrently filing a Motion for Continuation of a Stay. This motion requests a continued stay of eight additional days, to and including June 10, 2011.

Since the Court’s April 18, 2011, Order, the parties have moved closer to completing settlement. On May 24, 2011, plaintiff submitted a formal written offer, enclosing a draft Settlement Agreement and Stipulation for Entry of Judgment. The defendant’s attorney of record and the Smithsonian Institution have recently recommended approval of this offer. Accordingly, defendant is requesting an eight-day to provide sufficient time to obtain the

necessary authorizations to execute the settlement documents and to file the Stipulation with the Court.

Respectfully submitted,

THOMPSON HINE LLP

Dated: June 2, 2011

By: s/Eric N. Heyer by Walter W. Brown

Eric N. Heyer

1920 N Street, N.W., Suite 800

Washington, D.C. 20036

Telephone: (202) 331-8800

Fax: (202) 331-8330

eric.heyer@thompsonhine.com

Counsel for Plaintiff Anne Pearse-Hocker

TONY WEST

Assistant Attorney General

JOHN FARGO

Director

Dated: June 2, 2011

s/Walter W. Brown

Walter W. Brown

Attorney

Commercial Litigation Branch

Civil Division

Department of Justice

Washington, D. C. 20530

Telephone: (202) 307-0341

Facsimile: (202) 307-0345

Attorneys for the United States