

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

_____)	
Richard A. Horn,)	
)	
Plaintiff,)	
)	
v.)	No. 1:94-CV-1756 (RCL)
)	
Franklin Huddle, Jr.)	
and Arthur Brown,)	
)	
Defendants.)	
_____)	

PARTIES’ JOINT MOTION TO STAY PROCEEDINGS

Plaintiff, Richard Horn, defendants, Franklin Huddle, Jr. and Arthur Brown, and the United States respectfully move the Court to stay further proceedings. With the assistance of a mediator, through the appellate mediation program, the parties have reached an agreement in principle to settle the underlying litigation. We anticipate that the final negotiations on a settlement agreement, along with the implementation of that agreement, will be completed within 30 days. Accordingly, we respectfully request that this Court hold proceedings in abeyance for 30 days, until October 30, 2009. By that date, or sooner, the parties will notify the Court concerning the status of settlement negotiations. As noted, counsel for the parties consent to this motion, and the mediator concurs.

Counsel for the non-parties have also been consulted concerning the parties’ joint motion. Counsel for George J. Tenet, Shirley Woodward, Esq., stated that Mr. Tenet opposes the parties’ joint motion. All of the other non-parties consent to the granting of the parties’ joint motion.

Date: September 30, 2009

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 30th day of September, 2009 the foregoing were served upon the counsel of record listed below by electronic mail:

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