

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

VINCENT FORRAS, et al.,)
)
 Plaintiffs)
)
 v.)
)
 IMAM FEISAL ABDUL RAUF, et al.)
)
 Defendants)

**Case No. 1:12-cv-00282-RWR
Judge Richard W. Roberts**

JOINT REPORT PURSUANT TO ORDER DATED MARCH 28, 2013

Pursuant to this Court’s Minute Order dated March 28, 2013, Plaintiffs and Defendant Adam Leitman Bailey (“Bailey”), by their undersigned counsel, hereto jointly report to the Court as follows:

1. On March 22, 2012, Bailey filed a Motion to Stay During Pendency of Similar D.C. Superior Court Action.¹ In the motion, Bailey advised this Court that Plaintiffs had filed a motion to dismiss the Superior Court Action without prejudice, and that Bailey had opposed such motion and asked for a ruling on his motion for judgment on the pleadings with prejudice.

Bailey asked this Court to stay the instant proceedings until a decision was made in the Superior Court.

2. On March 28, 2013, this Court granted Bailey’s motion for a stay, over Plaintiffs’ objection, and required the parties to submit this Joint Report.

3. Unbeknownst to counsel for Plaintiffs or Bailey, on August 7, 2012, the Superior Court issued an Order granting Plaintiffs’ motion and dismissing the Superior Court Action without prejudice. Apparently the e-filing system went amiss. Counsel for Bailey only recently

¹ Undersigned counsel for Bailey does not represent Defendant Rauf and makes no representations on his behalf.

learned of the August 7, 2012 Order after receiving this Court's March 28, 2013 Minute Order and reviewing the Superior Court docket.

4. Counsel for Plaintiffs and Bailey have conferred, and they agree that, with this Court's permission, Bailey may have one month from the date of this Joint Report to file a Motion to Dismiss, which is how he intends to respond to the Complaint.

WHEREFORE, Plaintiffs and Defendant Bailey respectfully request that the Court lift the stay on these proceedings and give Defendant Bailey one month to file his Motion to Dismiss.

Respectfully submitted,

/s/ Larry Klayman
Larry Klayman
D.C. Bar No. 334581

Klayman Law Firm
2020 Pennsylvania Avenue, N.W.
Suite 345
Washington, D.C. 20006
(310) 595-0800
leklayman@gmail.com

/s/ Christopher G. Hoge
Christopher G. Hoge
D.C. Bar No. 203251

Crowley, Hoge & Fein, P.C.
1730 Rhode Island Avenue, N.W.
Suite 1015
Washington, D.C. 20036
(202) 483-2900
chfcgh@aol.com

cgh/z/wpdirs/civ
abaileyjointreport.doc