

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>JOHN EAKIN,</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	
<b>vs.</b>	§	<b>Civil Action No. SA-16-CV-0972</b>
	§	
<b>UNITED STATES DEPARTMENT OF DEFENSE,</b>	§	
	§	
<b>Defendant.</b>	§	

**JOINT MOTION TO EXTEND STATUS REPORT DEADLINE**

Plaintiff, John Eakin and Defendant, United States Department of Defense, hereby respectfully request an extension of time within which they must submit a Joint Status Report and in support of this motion, state as follows:

1. On December 17, 2019, this Court ordered the parties to submit a Joint Status Report regarding the release of the remaining A-L Individual Deceased Personnel Files so that the Court may monitor the Defense Department’s compliance with its August 2, 2017 Order (EFC Nos. 54 and 30, respectively).
2. The parties’ Joint Status Report is due January 16, 2020.
3. Defendant requires additional time to submit an accurate status to Plaintiff regarding an estimate of the volume of records still requiring review prior to release.
4. For these reasons, Plaintiff and Defendant request an extension of 30 days to submit their Joint Status Report regarding the release of the remaining A-L Individual Deceased Personnel Files.

WHEREFORE, Plaintiff and Defendant respectfully request an extension of 30 days from January 18, 2020, within which to submit their Joint Status Report.

DATED: January 17, 2020

Respectfully submitted,

**JOHN F. BASH**  
United States Attorney

By: /s/ Jacquelyn M. Christilles  
**JACQUELYN M. CHRISTILLES**  
Assistant United States Attorney  
Texas Bar No. 24075431  
601 N.W. Loop 410, Suite 600  
San Antonio, Texas 78216  
Telephone: (210) 384-7355  
Facsimile: (210) 384-7312  
E-mail: [jacquelyn.christilles@usdoj.gov](mailto:jacquelyn.christilles@usdoj.gov)

**ATTORNEYS FOR DEFEENDANT**

/s/ John J. Eakin with permission by JMC  
**JOHN J. EAKIN**  
PRO-SE  
9865 Tower View  
Helotes, Texas 78023  
Email: [jeakin@airsafety.com](mailto:jeakin@airsafety.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was electronically filed via the Court's CM/ECF system on this 17th day of January, 2020, and that Plaintiff will receive a copy of same via the Court's CM/ECF system as follows:

John J. Eakin  
9865 Tower View  
Helotes, Texas 78023  
[jeakin@airsafety.com](mailto:jeakin@airsafety.com)  
*PRO SE*

/s/ Jacquelyn M. Christilles  
**JACQUELYN M. CHRISTILLES**  
Assistant United States Attorney