

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

RUBY FREEMAN, <i>et al.</i> , Plaintiffs, v. HERRING NETWORKS, INC., <i>et al.</i> , Defendants.	Case No. 1:21-cv-03354 (BAH) Chief Judge Beryl A. Howell JURY TRIAL DEMANDED
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JOINT STATUS REPORT REGARDING MEDIATION

Plaintiffs Ruby Freeman and Wandrea “Shaye” Moss (the “Plaintiffs”), with the consent of Defendants Herring Networks, Inc. (“OAN”), Charles Herring, Robert Herring, and Chanel Rion (the “OAN Defendants”), (collectively, “Participating Parties”) respectfully file this joint status report pursuant to the Court’s March 22, 2022 Minute Order. The Participating Parties held a successful one-day mediation on April 19, 2022, during which they agreed upon and signed a binding set of settlement terms that they anticipate memorializing in a formal settlement agreement. Once finalized and pursuant to the terms of that agreement, Plaintiffs intend to file a motion to dismiss the OAN Defendants.

Accordingly, it is the Participating Parties’ understanding that they need not meet and confer or file a Joint Meet and Confer Report as required by the Court’s Standing Order and the federal and local rules. Plaintiffs and Defendant Giuliani already have held that conference and intend to file the Report as required.

Dated: April 21, 2022

Respectfully submitted,

UNITED TO PROTECT DEMOCRACY, INC.
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**Pro hac vice application forthcoming*