IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

KNIGHT FIRST AMENDMENT INSTITUTE AT COLUMBIA UNIVERSITY, *et al.*, *Plaintiffs*, *v.* CENTRAL INTELLIGENCE AGENCY, *et al.*, *Defendants*.	)	Civil Action No. 1:18-cv-2709 (TNM)

JOINT STATUS REPORT AND PROPOSED SCHEDULE FOR FURTHER PROCEEDINGS

Pursuant to the Court's Order of February 11, 2019, the parties to the above-captioned case hereby submit the following Joint Status Report and Proposed Schedule for Further Proceedings.

This is an action under the Freedom of Information Act ("FOIA"). Plaintiffs' FOIA requests seek three categories of documents related to Intelligence Community Directive 191 and the late Jamal Khashoggi from the Central Intelligence Agency ("CIA"), Federal Bureau of Investigation ("FBI"), National Security Agency ("NSA"), and Department of State ("DoS"). *See* First Amended Complaint ("FAC"), Dkt. No. 17, ¶ 17. Plaintiffs seek the same categories of documents, as well as an additional fourth category of related documents, from the Office of the Director of National Intelligence ("ODNI"). *Id.* ¶ 18. All Defendants have initiated a search for records potentially responsive to the requests. On February 14, 2019, ODNI informed Plaintiffs that it had located records responsive to the first category of requested documents, but that it had referred these records to other Defendant agencies for processing and production. ODNI issued a *Glomar* response to the remaining three categories of requested documents. The remainder of the

Defendants are at present actively searching for and/or processing potentially responsive documents. Given the nature of the request, any responsive records will need to be carefully reviewed for any applicable exemptions.

The parties have conferred and agree on the following proposed schedule for further proceedings.

(1) CIA and NSA shall provide a final response to Plaintiffs' FOIA requests on or before March 15, 2019.

(2) FBI and DoS shall provide a final response to Plaintiffs' FOIA requests on or before March 29, 2019.

(3) The parties shall meet and confer following the completion of all Defendants' final responses to determine if dispositive motions are necessary. The parties shall file a joint status report no later than April 12, 2019, proposing a schedule for dispositive motions, if necessary.

Additionally, the parties agree that a motion for an Open America stay is not likely in this case. Further, the parties agree that an estimate of the anticipated number of documents responsive to the request, or assessment of whether a Vaughn index will be required, is not necessary at this time. The parties will include updates on these subjects in their proposed April 12, 2019 status report.

The adoption of the proposed production schedule will facilitate the efficient resolution of this lawsuit and conserve the Court's resources. Accordingly, the parties respectfully request that the Court enter the above-described schedule for further proceedings.

A proposed order reflecting this proposal is attached hereto for the convenience of the Court.

Plaintiffs reserve their rights to challenge the adequacy of Defendants' searches and the lawfulness of Defendants' withholdings.

Respectfully submitted,

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