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 BRIEFING SCHEDULE

Pursuant to the Court's Order of March 4, 2019, the parties hereby submit the following Joint Status Report and Proposed Briefing Schedule.

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 completed their searches and processing, and provided final productions. The parties have conferred and agree that a conferral period is warranted, in order to allow the parties an opportunity to exchange information and attempt to narrow the issues remaining for resolution by the Court. To that end, the parties jointly propose the following schedule. This schedule takes into account both the other litigation responsibilities as well as various upcoming travel plans of the undersigned

counsel and other personnel who will be assisting in the preparation of the parties' anticipated filings.

(1) The parties shall engage in a conferral process to exchange information and attempt to narrow the issues in dispute. This period shall conclude, and Plaintiffs shall identify all issues and withholdings they plan to challenge to Defendants on or before May 17, 2019.

(2) Defendants shall file a motion for summary judgment and accompanying memorandum in support thereof on or before June 21, 2019.

(3) Plaintiffs shall file their cross-motion for summary judgment, with a single memorandum in support of their own motion and in opposition to Defendants' motion, on or before July 19, 2019.

(4) Defendants shall file a single memorandum containing their reply arguments in support of their own motion and in opposition to Plaintiffs' motion, on or before August 16, 2019.

(5) Plaintiffs shall file a reply memorandum in support of their motion no later than September 6, 2019.

The adoption of the proposed briefing 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.

Respectfully submitted,

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