IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN CIVIL LIBERTIES UNION and AMERICAN CIVIL LIBERTIES UNION FOUNDATION, Plaintiffs, v. CENTRAL INTELLIGENCE AGENCY *et al.*, Defendants.	Case No. 1:16-cv-01256 (EGS)

JOINT STATUS REPORT AND PROPOSED SCHEDULE FOR FURTHER PROCEEDINGS

Plaintiffs American Civil Liberties Union and American Civil Liberties Union Foundation (collectively, "the ACLU" or "Plaintiffs") submitted identical Freedom of Information Act ("FOIA") requests to nineteen (19) different Government entities for seven different categories of information related to Defendants' respective prepublication review processes. ECF No. 1. In this action, the ACLU sued eighteen of those entities for failing to respond to its FOIA requests. *Id.*[1] The parties submitted Joint Proposed Scheduling Orders updating the Court on the status of the FOIA requests at issue on November 4, 2016; April 7, 2017; June 23, 2017; August 25, 2017; October 20, 2017; December 22, 2017; March 9, 2018; May 18, 2018; August 10, 2018; September 21, 2018;

[1] While reserving its right to seek attorney's fees, the ACLU has stipulated to dismissal of seven entities: Coast Guard, Department of Defense, Department of Energy, Department of Justice, Drug Enforcement Administration, Marines, and National Geospatial-Intelligence Agency. *See* ECF No. 28.

December 10, 2018; and February 11, 2019. ECF Nos. 23, 26, 27, 29, 30, 32, 36, 37, 39, 40, 42, 45.

Pursuant to the Court's Order of February 12, 2019, the parties now file this Joint Status Report and Proposed Schedule for Further Proceedings, updating the Court on the status of Defendants' responses to Plaintiffs' FOIA requests and proposing a schedule for further proceedings.

I. Status of FOIA requests

All remaining Defendants (Air Force, Central Intelligence Agency ("CIA"), Defense Intelligence Agency, Department of Homeland Security, Department of State, Department of the Treasury, Federal Bureau of Investigation, National Reconnaissance Office, National Security Agency, Navy, and Office of the Director of National Intelligence) have finished producing all non-privileged, responsive records.

The parties continue to discuss what Plaintiffs characterize as objections regarding one aspect of the Air Force's and CIA's productions.

II. Proposed schedule for further proceedings

The parties have conferred, and jointly propose the following schedule for further proceedings:

- Plaintiffs shall communicate all issues and withholdings they plan to challenge to Defendants on or before July 31, 2019.
- The parties shall meet and confer, and file a further joint status report no later than August 7, 2019, proposing a schedule for dispositive motions.

The parties respectfully submit that the adoption of the proposed 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.

Dated: July 26, 2019

Respectfully submitted,

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