UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

CAMPAIGN FOR ACCOUNTABILITY, Plaintiff, v. UNITED STATES DEPARTMENT OF JUSTICE, Defendant.	No. 1:16-cv-1068 (KBJ)

SECOND JOINT STATUS REPORT

Pursuant to the Court's November 20, 2020 Order, Plaintiff Campaign for Accountability ("Plaintiff") and Defendant United States Department of Justice ("Defendant") respectfully submit this Second Joint Status Report to address further proceedings in this case. The parties met and conferred telephonically on November 30, 2020.

The parties have conferred and believe that they can work jointly to develop an adequate factual record for summary judgment without the need for discovery at this time. The parties have discussed establishing that record through either a declaration submitted by Defendant, drafted in consultation with Plaintiff, or a joint stipulation of facts. To further these discussions, the parties jointly propose that Defendant share a draft statement of facts with Plaintiff by January 8, 2021. Plaintiff will provide its response and any requests for modifications to the statement to Defendant by January 22, 2021. After consulting, the parties will file a Third Joint Status Report by February 12, 2021, to advise the Court of whether and when the parties are prepared to proceed to summary judgment.

DATED: December 3, 2020

Respectfully submitted,

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