UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

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

THIRD JOINT STATUS REPORT

Pursuant to the Court's March 5, 2021 Order, Plaintiff Campaign for Accountability ("Plaintiff") and Defendant United States Department of Justice ("Defendant") respectfully submit this Third Joint Status Report to address further proceedings in this case. The parties met and conferred by email on April 5, 2021.

The parties have conferred and made progress on a joint factual record for summary judgment to obviate the need for discovery at this time. To continue these discussions, the parties jointly propose that Plaintiff submit any outstanding factual questions based on the parties' initial exchange of drafts to Defendant by April 12, 2021. Defendant will share a second draft statement of facts that incorporates responses to Plaintiff's inquiries with Plaintiff by April 26, 2021. Plaintiff will provide any edits to the statement to Defendant by May 10, 2021. After consulting, the parties will file a Fourth Joint Status Report by May 24, 2021, to advise the Court of whether and when the parties are prepared to proceed to summary judgment.

DATED: April 5, 2021

Respectfully submitted,

/s/ *Alex Abdo*
Alex Abdo, *Pro Hac Vice*
Stephanie Krent, *Pro Hac Vice*
Xiangnong Wang, *Pro Hac Vice*
Knight First Amendment Institute
at Columbia University
475 Riverside Drive, Suite 302
New York, NY 10115
(646) 745-8500
alex.abdo@knightcolumbia.org

Counsel for Plaintiff

BRIAN M. BOYNTON
Acting Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Branch Director

/s/ Brian C. Rosen-Shaud
BRIAN C. ROSEN-SHAUD
Trial Attorney (Maine Bar No. 006018)
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L St NW
Washington, D.C. 20005
Telephone: (202) 305-7667
Email: Brian.C.Rosen-Shaud@usdoj.gov

Counsel for Defendant