IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

KNIGHT FIRST AMENDMENT INSTITUTE AT COLUMBIA UNIVERSITY, *et al.*	)	
Plaintiffs,	)	Civil Action No. 18-1129 (EGS)
v.	)	
DEPARTMENT OF DEFENSE, *et al.*	)	
Defendants.	)	

JOINT STATUS REPORT

Plaintiffs Knight First Amendment Institute at Columbia University, American Civil Liberties Union, and American Civil Liberties Union Foundation (collectively, "Plaintiffs"), and Defendants respectfully submit this Joint Status Report ("JSR"), pursuant to the Court's Order of November 1, 2021. *See* Minute Order (Nov. 1, 2021).

1. This lawsuit involves three separate FOIA requests, which together seek records from twenty (20) separate Executive Branch agencies related to their respective pre-publication review processes—the policies and procedures governing the review of written materials drafted or prepared by current or former federal government employees, which discuss or reference their federal government service, prior to public release. *See* Compl. ¶¶ 1, 14-123. Several prior JSRs set forth the nature and scope of the FOIA requests in detail. *See* Dkt. Nos. 30, 31, 33, 41, 43, 44, 47.

2. In the parties' last JSR, filed on October 29, 2021, Defendants reported that, although all defendant agencies had completed their productions, a few agencies had outstanding referrals (*i.e.*, documents originating with other agencies and referred to them for processing and direct response to Plaintiffs) that required final processing. Dkt. No. 53

¶ 3. The Central Intelligence Agency ("CIA") is presently completing processing on one outstanding set of referred documents and expects to produce it to Plaintiffs within the next two weeks. Aside from that forthcoming production, the last outstanding referrals involve CIA and the National Security Agency ("NSA"). CIA and NSA are working actively to confer as necessary to complete processing of these final documents; while they do not presently have an estimated completion date, both agencies recognize the importance of producing these documents with sufficient time to address any additional conferral questions before the next proposed JSR deadline in April. *See infra* ¶ 4.

3. Meanwhile, the parties are actively contintuing their conferral regarding Defendants' productions. Those discussions, which the parties are undertaking with the shared goal of narrowing or resolving any issues that may otherwise require judicial resolution, have been productive. Due to the number of agency Defendants, the volume of Defendants' collective productions, and the number of detailed questions posed by Plaintiffs, additional time is needed to complete the conferral process.

4. Accordingly, the parties propose that they file a further Joint Status Report on or before April 29, 2022, that will (1) update the Court on the status of referrals, (2) inform the Court of the parties' progress on their conferral efforts, and (3) propose a briefing schedule, if necessary.

Dated: January 26, 2022

Respectfully submitted,

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