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 March 8, 2022. *See* Minute Order (Mar. 8, 2022).

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, 49, 50, 51.

2. In the parties' last JSR, filed on January 26, 2022, Defendants reported that, although all defendant agencies had completed their productions, the Central Intelligence Agency ("CIA") and National Security Agency ("NSA") 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. 54 ¶ 3.

3. Since that filing, CIA completed processing of all outstanding documents that had been referred to it for final processing and production.

4. NSA's processing of the outstanding documents that were referred to it for final processing and production is actively ongoing. NSA estimates that it will complete this task and make a final production to Plaintiffs by May 31, 2022.

5. Meanwhile, the parties are actively continuing 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, continue to be 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.

6. Accordingly, the parties propose that they file a further Joint Status Report on or before August 4, 2022, that will inform the Court of the parties' progress on their conferral efforts, and propose a briefing schedule, if necessary.

Dated: May 3, 2022

Respectfully submitted,

/s/ Ramya Krishnan
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