

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN CENTER)	
FOR LAW AND JUSTICE,)	
)	
Plaintiff,)	Civil Action No. 17-CV-1866 (APM)
)	
v.)	
)	
UNITED STATES DEPARTMENT)	
OF JUSTICE,)	
)	
Defendant.)	
_____)	

JOINT STATUS REPORT

Pursuant to the Court’s Minute Order dated October 24, 2017 (the “Order”), the parties hereby respectfully submit this joint status report.

1. The status of Plaintiff’s FOIA request

Defendant has searched for records responsive to Plaintiff’s FOIA request. It is currently reviewing and processing records, and awaiting a consultation response. Defendant anticipates releasing non-exempt, responsive records on or about November 30, 2017.

2. The anticipated number of documents responsive to Plaintiff’s FOIA request

Defendant has located approximately 30 pages.

3. The anticipated date(s) for release of documents responsive to Plaintiff’s FOIA request

Defendant expects to provide its final response to Plaintiff on or about November 30, 2017.

4. Whether a motion for an *Open America* stay is likely in this case

Defendant does not anticipate seeking an *Open America* stay in this case.

5. A proposed briefing schedule for dispositive motions, if applicable

The parties do not know at this time whether summary judgment briefing will be necessary. Once the agency releases non-exempt records, the parties intend to discuss and try to resolve any remaining issues prior to seeking the Court's assistance.

Accordingly, the parties respectfully request that the Court permit the parties to file a joint status report on or before December 15, 2017, in which the parties either propose a briefing schedule for dispositive motions or request additional time for the parties to try to resolve any remaining issues.

Dated: November 7, 2017

/s/ Abigail A. Southerland
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