

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN CENTER FOR LAW &
JUSTICE,

Plaintiff,

v.

DEPARTMENT OF STATE,

Defendant.

Civil Action No. 24-0758 (RC)

JOINT STATUS REPORT

Pursuant to the Court's June 3, 2024 Minute Order, Plaintiff, American Center for Law & Justice, and Defendant, the U.S. Department of State, respectfully submit this joint status report.

1. This action concerns a Freedom of Information Act ("FOIA") request submitted on February 13, 2024, which is attached to the Complaint at ECF No. 1-1.

2. Defendant's preliminary searches have resulted in more than 58,000 (and counting) potentially responsive records. The parties continue to discuss how to narrow the FOIA request.

3. On June 3, 2024, Plaintiff proposed a narrowed FOIA request.

4. On July 2, 2024, Defendant provided Plaintiff with an updated preliminary hit count for the narrowed request, which continues to show more than 58,000 potentially responsive records (a record may consist of multiple pages). Defendant has also preliminarily estimated that it would take Defendant more than 150 years to process the volume of potentially responsive records. Defendant has advised Plaintiff that it will move for summary judgment on undue burden grounds if the parties are unable to narrow this request to a manageable scope.

5. Plaintiff is willing to narrow and, in light of its first proposal returning the same amount of records, deliberating how to best do so.

6. Pursuant to the Court's June 3, 2024 Minute Order, the parties will submit their next joint status report within the next ninety days.

Dated: July 9, 2024

Respectfully submitted,

**THE AMERICAN CENTER FOR
LAW AND JUSTICE**

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