

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

AMERICAN CENTER FOR LAW AND  
JUSTICE,

*Plaintiff,*

v.

FEDERAL BUREAU OF INVESTIGATION,

*Defendant.*

No. 1:23-cv-01494-CKK

**JOINT STATUS REPORT**

Plaintiff American Center for Law and Justice and Defendant Federal Bureau of Investigation (“FBI”), by and through their undersigned counsel, respectfully submit the following joint status report pursuant to the Court’s July 17, 2023 Order:

1. Plaintiff filed this Freedom of Information Act (“FOIA”) lawsuit on May 24, 2023, concerning seven FOIA requests previously submitted to the FBI. The FBI answered the complaint on July 10, 2023, and on July 17, 2023, the Court ordered the parties to file a joint status report on or before August 14, 2023.

2. Pursuant to the Court’s July 17 Order, the parties conferred, and the FBI represented to Plaintiff that, thus far, it has identified 1,200 pages of potentially responsive documents.

3. The FBI further represented that its search and processing of records is still ongoing, and the parties agree that it would be premature to set a proposed schedule or begin briefing on dispositive motions at this time.

4. The parties further agree that it is unlikely that an *Open America* stay will be necessary and that it is premature to determine whether a *Vaughn* index will be required.

5. Accordingly, the parties respectfully request that they be permitted to file a joint status report in 45 days, *i.e.*, on or before September 28, 2023. At that time, the parties will update the Court with respect to the status of this matter, and, if appropriate, will offer a proposal for a schedule for further proceedings.

Dated: August 14, 2023

/s/ John A. Monaghan  
JOHN A. MONAGHAN  
American Center for Law and Justice

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*Counsel for Plaintiff*

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

ELIZABETH J. SHAPIRO  
Deputy Branch Director

/s/ Sarah M. Suwanda  
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