

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

JUDICIAL WATCH, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:06-CV-00406 (HHK)
	)	
U.S. DEPARTMENT OF JUSTICE,	)	
	)	
Defendant	)	
_____	)	

**STIPULATION AND PROPOSED ORDER**

In order to provide for efficient and timely resolution of this matter arising under the Freedom of Information Act, Plaintiff Judicial Watch, Inc. and Defendant U.S. Department of Justice (“DOJ”) hereby stipulate and agree as follows:

1. On or before September 15, 2006, DOJ shall complete production of all records responsive to Plaintiff’s January 6, 2006 Freedom of Information Act request that are not subject to claims of exemption.
  
2. On or before October 13, 2006, DOJ shall produce a *Vaughn* index/affidavit of all records withheld from Plaintiff in its various productions. The aforementioned *Vaughn* Index shall not include classified information, but shall specify or identify the specific exemptions under which information, whether classified or not is being withheld. If Defendant makes a “Glomar” response, Defendant shall so inform Plaintiff.
  
3. On or before October 31, 2006, Plaintiff shall notify counsel for DOJ whether Plaintiff intends to challenge any of DOJ’s withholdings and, if so, which such withholdings it intends to challenge. The parties shall then negotiate in good faith to set a briefing schedule, which shall take into account the volume of withholdings Plaintiff is challenging, affording each

party adequate time to prepare documents necessary for the Court's consideration of any such challenges. If the parties are unable to agree on a briefing schedule by November 15, 2006, the parties shall ask the Court to set an appropriate briefing schedule with respect to any challenges by Plaintiff to DOJ's withholdings.

Dated: August 3, 2006

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/s/ JA  
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Respectfully submitted,

JUDICIAL WATCH, INC.

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*Counsel for Plaintiff*

SO ORDERED this \_\_ day of \_\_\_\_\_, 2006.

\_\_\_\_\_  
Henry H. Kennedy, Jr., U.S.D.J.