

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

JUDICIAL WATCH, INC.,)	
)	
Plaintiff,)	
)	Civil Action No. 15-cv-690 (RMC)
v.)	
)	
U.S. DEPARTMENT OF STATE,)	
)	
Defendant.)	
_____)	

JOINT STATUS REPORT

Pursuant to the Court’s June 15, 2015 Order requiring the submission of a joint dispositive motion briefing schedule, Plaintiff Judicial Watch, Inc. and Defendant U.S. Department of State, by and through counsel, respectfully submit this Joint Report:

1. On March 6, 2015, Plaintiff submitted two FOIA requests to Defendant seeking access to records.
2. Plaintiff initiated the above-captioned lawsuit on May 6, 2015.
3. Defendant filed its Answer on June 11, 2015.
4. The parties have met and conferred, and submit their joint proposed briefing schedule below:
 - a. Defendant will complete all searches and produce to Plaintiff all responsive, non-privileged, and non-exempt records within its possession, custody, or control no later than August 14, 2015.
 - b. The Parties will meet and confer and file a status report by August 28, 2015 indicating whether additional briefing is necessary. If additional

briefing is necessary, the Parties will propose a briefing schedule, which may be based upon the following schedule:

- i. Defendant will file its dispositive motion no later September 28, 2015.
- ii. Plaintiff will file its dispositive motion and opposition to Defendant's dispositive motion by October 28, 2015.
- iii. Defendant will file its reply in support of its dispositive motion and its opposition to Plaintiff's dispositive motion by November 30, 2015.
- iv. Plaintiff will file its reply in support of its dispositive motion by December 14, 2015.

Dated: June 29, 2015

Respectfully submitted,

/s/ Lauren Burke
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