

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

_____	)	
JUDICIAL WATCH, INC.,	)	
	)	
Plaintiff,	)	Civil Action No. 13-cv-1363 (EGS)
	)	
v.	)	
	)	
U.S. DEPARTMENT OF STATE,	)	
	)	
Defendant.	)	
_____	)	

**PLAINTIFF’S URGENT RESPONSE TO  
DEFENDANT’S STATUS REPORT**

Plaintiff Judicial Watch, Inc., by counsel, respectfully submits this urgent response to Defendant’s Status Report:

1. Last week, on July 31, 2015, the Court ordered Defendant to take four specific actions and to update the Court on its compliance today.
2. Defendant filed its update a short time ago.
3. Although Defendant, Secretary Clinton, Ms. Abedin, and Ms. Mills failed to provide nearly all of the information required by the Court’s order, this urgent response is to highlight one startling revelation.
4. By letter dated August 6, 2015, Ms. Mills’ attorney informed Defendant, “Following our production on August 10, 2015, we have instructed [Ms. Mills] to **delete** any and all electronic copies [of potential federal records] in her possession.” *See* August 6, 2015 Letter from Beth A. Wilkinson to Patrick F. Kennedy, attached as Exhibit A to Defendant’s Status Report (emphasis added).

5. To Plaintiff's knowledge, Defendant has not taken any steps to prevent Ms. Mills from destroying *on Monday* any federal records that may be responsive to Plaintiff's FOIA request.

6. Any destruction of federal records blatantly disregards the Court's order.

7. Because it appears as though Ms. Mills will destroy federal records as early as Monday morning, Plaintiff believes it necessary to bring this to the Court's attention now. Plaintiff anticipates responding in full to Defendant's incomplete Status Report early next week.

Dated: August 7, 2015

Respectfully submitted,

/s/ Michael Bekesha  
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