

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

JUDICIAL WATCH, INC.,)	
)	
Plaintiff,)	
)	Civil Action No. 14-cv-1511 (ABJ)
v.)	
)	
U.S. DEPARTMENT OF STATE,)	
)	
Defendant.)	
_____)	

SECOND JOINT STATUS REPORT

Plaintiff Judicial Watch, Inc. and Defendant U.S. Department of State, by counsel and pursuant to the Court’s October 20 2015 minute order, respectfully submit this Second Joint Status Report:

1. The State Department has completed its review of approximately one-third of the twenty-three responsive records identified in the agency’s October 22, 2015 status report. The parties propose that these responsive records be will produced to Plaintiff on November 2, 2015.

2. The remaining records are still undergoing review for public release. Given the subject matter of the FOIA request at issue in this case, this review may require consultation with one or more other government agencies. Accordingly, the parties propose that, by November 30, 2015, the State Department will produce to Plaintiff the non-exempt portions of those records that do not have to be referred to one or more other agencies for consultation and will refer all responsive records that require inter-agency consultation to the appropriate agency or agencies. The parties also propose that one week later, on December 7, 2015, the State Department will file a status report in which it discloses the number of records produced, the number of records referred to other agencies for consultation, and the number of agencies to which responsive

records were referred. Finally, the parties propose that, within two weeks of completion of all inter-agency consultations for a given record, the State Department will produce any non-exempt portions of that record.

Dated: October 29, 2015

Respectfully submitted,

/s/ Paul J. Orfanedes
PAUL J. ORFANEDES
D.C. Bar No. 429716
JUDICIAL WATCH, INC.
425 Third Street SW, Suite 800
Washington, DC 20024
Tel: (202) 646-5172
porfanedes@judicialwatch.org

Counsel for Plaintiff

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Branch Director

/s/ Robert J. Prince
ROBERT J. PRINCE
D.C. Bar No. 975545
U.S. DEPARTMENT OF JUSTICE
Civil Division, Federal Programs Branch
20 Massachusetts Avenue NW
Washington, DC 20530
Tel: (202) 305-3654
robert.prince@usdoj.gov

Counsel for Defendant