

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

JUDICIAL WATCH, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 15-2030 (CKK)
)	
UNITED STATES DEPARTMENT OF STATE,)	
)	
Defendant.)	
)	

JOINT STATUS REPORT

Pursuant to the Court’s February 1, 2016 Order, Plaintiff Judicial Watch, Inc. and Defendant United States Department of State, by and through the undersigned counsel, hereby submit this Joint Status Report.

As the Court will recall, this case concerns Plaintiff’s requests under the Freedom of Information Act. Defendant reports that it has finished its search for responsive documents and has collected approximately 5,800 pages of documents, most or all of which are believed to be responsive to Plaintiff’s FOIA requests. Defendant anticipates producing non-exempt documents responsive to Plaintiff’s FOIA requests, with the exception of cooperation agreements sought in paragraph 1 of Plaintiff’s May 22, 2015 request, *see* Dkt. 1 ¶ 5, by May 2, 2016. Defendant will thereafter produce non-exempt portions of the aforementioned cooperation agreements on a rolling basis, with productions occurring every thirty days. The parties agree to file joint status reports on the date of each document production.

The parties further agree that once all non-exempt responsive documents have been

produced, the parties will meet and confer in an attempt to informally resolve any issues that may exist regarding the document productions. If the parties are unable to resolve any such issues, they will propose a briefing schedule to the Court within 30 days of the completion of the final document release.¹

A proposed Order is attached.

Respectfully submitted,

CHANNING D. PHILLIPS, D.C. BAR # 415793
United States Attorney

DANIEL F. VAN HORN, D.C. BAR #924092
Chief, Civil Division

/s/

JOSHUA KOLSKY, D.C. BAR # 993430
Assistant United States Attorneys
District of Columbia
555 Fourth St., N.W.
Washington, D.C. 20530
Phone: (202) 252-2541
Fax: (202) 252-2599
joshua.kolsky@usdoj.gov

Counsel for Defendant

/s/

Lauren M. Burke
D.C. Bar. No. 1028811
Judicial Watch, Inc.
425 Third Street SW, Suite 800
Washington, DC 20024
(202) 646-5172

Counsel for Plaintiff

¹ The briefing schedule will depend, in part, on the number and type of withholdings by Defendant that are challenged by Plaintiff – information that will be known only after Defendant’s production is complete.