

**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.)	
_____)	

DEFENDANT’S STATUS REPORT

Defendant U.S. Department of State (“State”), by counsel and pursuant to the Court’s minute order of January 29, 2016, respectfully submits this status report:

1. The Freedom of Information (“FOIA”) request at issue in this action seeks “[a]ny and all records concerning, regarding, or related to notes, updates, or reports created in response to the September 11, 2012 attack on the U.S. Consulate in Benghazi, Libya . . . include[ing], but . . . not limited to, notes taken by then Secretary of State Hillary Rodham Clinton or employees of the Office of the Secretary of State during the attack and its immediate aftermath,” limited to the timeframe September 11-15, 2012. Complaint ¶ 5 (ECF No. 1).

2. On January 12, 2016, State reported to the Court that it had recently identified a source of potentially-responsive State Department documents—a collection of electronic files—that had not previously been identified or searched. *See* Def’s Mot. (ECF No. 24). State explained that to search these newly identified documents, it must upload the files to a system in which they can be electronically searched, and estimated that it could complete this process and file a status report disclosing the volume of potentially responsive documents and proposing a revised schedule by February 1, 2016.

3. On January 12, 2016, the Court entered a minute order directing State to complete this search and file a status report by February 1, 2016, specifying the volume of records involved and proposing a schedule for their review and production. Minute Order of Jan. 12. The Court further stated that, if Plaintiff objects to State's proposed schedule, it may respond and set forth the basis for its objections on or before February 5, 2016. *Id.* In its minute order of January 29, the Court granted State's motion seeking, on account of the recent blizzard, a 4-day extension until February 5 to file its status report. In that same order, the Court changed Plaintiff's deadline for a response to February 11.

4. State has performed keyword searches and applied appropriate date limitations, where possible, to determine that there are in excess of 1,700 pages which it must review for responsiveness and, for those documents that are responsive, review for information that is exempt and must be redacted.

5. State proposes that it make two monthly productions of the non-exempt portions of responsive documents subject to the FOIA, the first on March 7, 2016 and the second on April 7, 2016.

Dated: February 5, 2016

Respectfully submitted,

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ELIZABETH J. SHAPIRO
Deputy Branch Director

/s/ Robert J. Prince

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