

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

JUDICIAL WATCH, INC.

*Plaintiff,*

v.

U.S. DEPARTMENT OF STATE,

*Defendant.*

Civil Action No. 15-cv-692 (APM)

**PLAINTIFF’S RESPONSE TO DEFENDANT’S AUGUST 23, 2016 STATUS REPORT**

Plaintiff Judicial Watch, Inc., through counsel, submits the following response to Defendant’s Status Report (filed August 23, 2016; ECF No. 35). Plaintiff deems that it is necessary to respond because Defendant neglected to include the necessary information for the Court to determine whether Defendant’s proposed document production schedule is reasonable under the circumstances, or whether a shorter timeline is more appropriate in this case.

1. The number of documents Defendant is currently reviewing in response to Plaintiff’s FOIA Request 1 is necessary for the Court to determine whether Defendant’s proposed production schedule is reasonable. In its Status Report, Defendant recommends a rolling production schedule through October 31, 2016. As of the date of Defendant’s Status Report, Defendant completed its initial search by running certain, unidentified key word searches and limiting the documents for review to the timeframe specific to Plaintiff’s request. *See* Def. Status Rpt. (ECF No. 35), ¶¶ 3-4. Defendant, however, neglected to identify the number of documents that “satisfied the search terms” and which remain in the review process.

2. Without knowing the number of documents that remain to be reviewed, Plaintiff cannot determine whether it has reason to object to Defendant’s production schedule. Therefore,

Plaintiff respectfully requests that Defendant be ordered to submit to the Court and Plaintiff by Friday, August 26, 2016, the number of documents Defendant is left to review in response to Plaintiff's FOIA Request 1 so that the Court may determine whether Defendant's proposed production schedule is reasonable, or whether an earlier timeline is more appropriate in this case.

Dated: August 24, 2016

Respectfully submitted,

Judicial Watch, Inc.

/s/ Ramona R. Cotca

Ramona R. Cotca, D.C.

Bar No. 501159

425 Third Street SW, Suite 800

Washington, DC 20024

Tel: (202) 646-5172

Fax: (202) 646-5199

Email: rcotca@judicialwatch.org

*Attorneys for Plaintiff*