

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

JUDICIAL WATCH, INC.

*Plaintiff,*

v.

U.S. DEPARTMENT OF STATE,

*Defendant.*

Civil Action No. 14-cv-1242 (RCL)

**JOINT STATUS REPORT**

The parties, by counsel, respectfully submit this Joint Status Report and state the following:

1. Plaintiff Judicial Watch, Inc. initiated this Freedom of Information Act (“FOIA”) lawsuit against Defendant U.S. Department of State on July 21, 2014. (ECF No. 1) and perfected service on July 28, 2014. (ECF No. 4). Defendants answered the complaint on August 27, 2014. (ECF No. 6).

2. In accordance with deadlines set forth in the Court’s Scheduling Order of September 15, 2014 (ECF No. 9), the parties filed a Joint Status Report (ECF No. 10) in which they advised the Court that (1) Defendant had produced to Plaintiff the non-exempt, responsive documents subject to the FOIA and a draft *Vaughn* index; (2) Plaintiff had completed its review of the draft *Vaughn* index and advised Defendant of its objections; and (3) the parties believe it might be possible to either settle this case or to narrow the issues which must be presented to the Court for adjudication. In that status report, the parties also respectfully proposed that they continue to confer and file a joint status report, including joint recommendations for further proceedings, should they be necessary, by no later than February 2, 2015.

3. In the course of preparing additional information to provide to Plaintiff for purposes of settlement discussions, Defendant has discovered that additional searches for documents potentially responsive to the FOIA must be conducted. Therefore, the parties respectfully propose that Defendant will, by April 2, 2015, perform the additional searches and provide to Plaintiff (1) any additional non-exempt, responsive documents subject to the FOIA that may be uncovered by the search, (2) a revised draft *Vaughn* index reflecting any withholdings made in such documents, and (3) a draft declaration describing how Defendant conducted searches for potentially responsive documents.

4. The parties continue to believe it might be possible to either settle this case or to narrow the issues which must be presented to the Court for adjudication. The parties therefore further respectfully propose that, by April 24, 2015, Plaintiff shall complete its review of the information described in ¶ 3 above and notify Defendant whether it will raise any objections to the search or to any withholdings made by Defendant. The parties shall then continue to confer and file a joint status report, including joint recommendations for further proceedings, should they be necessary, by no later than May 1, 2015.

Date: February 2, 2015

JUDICIAL WATCH, INC.

/s/ Ramona R. Cotca

RAMONA R. COTCA  
(D.C. Bar No. 501159)  
425 Third Street, SW, Suite 800  
Washington, DC 20024  
(202) 646-5172, ext. 328  
rcotca@JudicialWatch.org

*Counsel for Plaintiff*

Respectfully submitted,

JOYCE R. BRANDA  
Acting Assistant Attorney General

ELIZABETH J. SHAPIRO  
Deputy Branch Director

/s/ Robert J. Prince

ROBERT J. PRINCE (D.C. Bar No. 975545)  
United States Department of Justice  
Civil Division, Federal Programs Branch  
20 Massachusetts Ave., N.W.  
Washington, DC 20530  
Tel: (202) 305 3654  
robert.prince@usdoj.gov

*Counsel for Defendant*