

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

JUDICIAL WATCH, INC.,

Plaintiff,

v.

U.S. DEPARTMENT OF STATE,

Defendant.

Case No. 15-cv-687 (JEB)

**JOINT STATUS REPORT**

Pursuant to the Court's October 24, 2019 Minute Order, the parties, having conferred, jointly and respectfully submit the following status report in the above-captioned matter.

On November 1, 2019, Plaintiff Judicial Watch, Inc. provided to Defendant United States Department of State a list identifying 237 of the 450 documents on Defendant's draft *Vaughn* index that Plaintiff currently intends to challenge, absent Defendant's agreement to lift certain identified redactions or provide additional information about its withholdings. Defendant is currently reviewing Plaintiff's proposal, but needs additional time to review the documents in question and to prepare its response to Plaintiff. The parties believe that further discussion and negotiation might be productive, and remain hopeful that they will be able to (at least) narrow the current dispute.

In addition, the Federal Bureau of Investigation ("FBI") recently sent Defendant additional documents as part of the ongoing inter-agency consultation process in connection with other FOIA

litigation.<sup>1</sup> Defendant is working to determine whether that set of documents includes any responsive, non-duplicative agency records that have not already been processed. Defendant will promptly update Plaintiff and the Court once that initial review is complete.

Accordingly, the parties jointly and respectfully request that the Court set December 18, 2019 as the next deadline for the parties to file a joint status report regarding further proceedings in this case (or separate status reports, if they cannot reach agreement).

Dated: November 15, 2019

Respectfully submitted,

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/s/ Stephen M. Pezzi  
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<sup>1</sup> On May 14, 2019, Defendant produced to Judicial Watch an additional document responsive to the request at issue in this litigation that the FBI had sent to Defendant through another FOIA consult.