

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

JUDICIAL WATCH, INC.,

Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE,

Defendant.

Civil Action No. 1:22-cv-02264-RDM

**JOINT STATUS REPORT AND MOTION
TO CONTINUE INITIAL SCHEDULING CONFERENCE**

The parties respectfully submit this status report pursuant to the Court's September 8, 2022 Minute Order. The Plaintiff's Freedom of Information Act ("FOIA") request at issue in this case has two parts:

1. All records regarding the Federal Bureau of Investigation's Crossfire Hurricane investigation that were provided to the White House by the Department of Justice on or about December 30, 2020. For purposes of clarification, the records sought are those described in a January 19, 2021 Presidential Memorandum (see https://trnmpwhitehouse.archives.gov/prc_presidential_actions/memorandum-declassification-certain-materials-related-fbis-crossfire-hurricane-investigation/).
2. All records of communication between any official or employee of the Department of Justice and any official or employee of any other branch, department, agency, or office of the federal government regarding the declassification and release of the records described in part one of this request.

As to the first part of Plaintiff's FOIA request, Defendant has completed its search and is processing 815 pages responsive thereto. Defendant anticipates that it will begin production of non-exempt records responsive to the first part of Plaintiff's FOIA request on December 30, 2022, at a rate of 500 pages per month. As to the second part of Plaintiff's FOIA request, the parties are

conferring in an effort to narrow the scope of the request. Because that effort is ongoing, the parties are still working to determine whether there are any areas of substantive disagreement that will require briefing in this matter. Accordingly, the parties respectfully request that the Court continue the initial scheduling conference currently set for October 13, 2022, and permit them to submit another status report on November 4, 2022 updating the Court regarding their efforts to reach an agreement regarding the second part of Plaintiff's FOIA request.

Dated: October 6, 2022

Respectfully submitted,

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