

- 14,132 pages were stored as paper records within the file cabinets.
- 935,384 pages were stored on digital media devices throughout the file cabinets
- 415 pages are identified as Special Access Program (SAP) records are prohibited from being digitalized.

As reported in the May 14, 2026, status report (Dkt. No. 14), the FBI previously estimated the volume of the “recent files” to be approximately 112,500 pages. However, during the digitization process, the FBI located multiple data storage devices within the files containing media records that significantly increased the overall volume. As a result, the total volume of “recent files” is 949,931 pages, which exceeds that of the estimated total of legacy files. The FBI’s resources have been focused entirely on the digitization process, and at this time, it is unable to provide a proposed production schedule given the volume involved.

Given the scope of the records for the “recent files,” it will take approximately 158 years to process at a rate of 500 pages a month. The FBI respectfully requests an opportunity to confer with Plaintiffs’ counsel to determine how to best proceed. The FBI will provide a status update to this Court within 30 days that proposes either a production schedule, or a briefing schedule, whichever is appropriate.

B. Defendant’s Response to Plaintiff’s Discovery Request

In this filing, Plaintiff unnecessarily has advanced a variety of substantive arguments. The FBI, however, does not understand the purpose of a joint status report to be to litigate matters; rather, a joint status report should concisely update the Court on the status of a case and alert the Court to matters that may require more complete exploration by the parties or the Court later in the proceedings, and a joint status report can precipitate a schedule for such further proceedings that the Court deems appropriate. The FBI’s portions of this joint status report are prepared with these principles in mind. To the extent that the Court wishes for the parties to engage on the various