

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
PROTECT DEMOCRACY)	
PROJECT, INC.,)	
)	
	Plaintiff,)	
)	
v.)	Civil Action No. 17-cv-02118 (RDM)
)	
DEPARTMENT OF HOMELAND)	
SECURITY, <i>et al.</i> ,)	
)	
	Defendants.)	
_____)	

STATUS REPORT AND PROPOSED PRODUCTION SCHEDULE

Pursuant to the Court’s order from the bench at the Parties’ March 13, 2018, status conference, Defendants U.S. Department of Homeland Security (“DHS”), U.S. Customs and Border Protection (“CBP”), Office of Management and Budget (“OMB”), and Office of Personnel Management (“OPM”) (collectively, “the Defendants”), hereby provide the Court with the following Status Report and Proposed Production Schedule:

- **DHS** – DHS reports that its search for part (b) of Plaintiff’s request is complete and yielded 142 pages of potentially responsive documents. Searches were halted for parts (s) and (c) when a partial search for each yielded over 40 gigabytes of data, resulting in over 80 gigabytes for both searches so far. DHS could not continue the search because the Office of the Chief Information Officer (“OCIO”) does not have the storage capacity to maintain a response that large and the DHS Office of Privacy (“PRIV”) likewise does not have capacity to receive the response. DHS is unable to determine the exact number of documents of pages responsive to parts (a) and

(c). DHS is able to complete the 142 pages responsive to part (b) by May 15, 2018. DHS can continue to produce 250 pages per month from that point forward.

- **CBP** – CBP has completed most of its searches, which have resulted in approximately 21,120 e-mails (excluding attachments) that are potentially responsive and a contract that is potentially responsive. OPM also referred two documents, totaling eight pages, to CBP. CBP proposes to produce 500 pages per month to Plaintiff, beginning on June 22, 2018.
- **OMB** – OMB has completed its searches, which resulted in approximately 25,000 potentially responsive documents. Approximately 23,500 of these documents were the result of the search performed in response to Plaintiff's request regarding hiring. OMB proposes to review 300 documents per month and begin producing documents every 30 days beginning on May 14, 2018.

- **OPM** – On April 6, 2018, OPM sent Plaintiff a response letter, stating that its searches had resulted in 400 pages of potentially responsive material. OPM referred 340 of those pages to DHS for direct response to Plaintiff. OPM sent the remaining 60 pages to DHS for consultation and is awaiting their return from DHS to produce to Plaintiff. On April 12, 2018, CBP referred eight pages of records to OPM, which OPM believes were already captured and are duplicates of pages sent to DHS for consultation.

Dated: April 13, 2018

Respectfully submitted,

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By: /s/ Scott Leeson Sroka
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of April, 2018, that service of the foregoing **Status Report and Proposed Production Schedule** has been made on counsel of record through the Court's ECF system.

/s/ Scott Leeson Sroka

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