

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

<hr/>)	
GOVERNMENT ACCOUNTABILITY PROJECT,)	
)	
Plaintiff,)	
v.)	Case No: 17-2518 (CRC)
)	
U.S. DEPARTMENT OF HOMELAND SECURITY,)	
)	
Defendant.)	
<hr/>)	

STATUS REPORT AND PROPOSED SCHEDULE

Pursuant to the Court’s order dated February 14, 2018, the parties, by and through undersigned counsel, report to the Court as follows.

1. The Complaint in this action was filed under the Freedom of Information Act (“FOIA”). Defendant answered the Complaint on February 14, 2018.
2. This lawsuit involves a FOIA request by the Government Accountability Project (“GAP”) directed to the Department of Homeland Security (“DHS”) as more fully described in Attachment “A” to the Complaint.
3. DHS has conducted an initial search for records responsive to the request and, at this time, has identified 801 potentially responsive documents. DHS has begun reviewing these documents for actual responsiveness to the request and is confirming the completeness of its search. At this time, DHS is not in a position to estimate the number of potentially responsive documents that it will need to process. DHS expects to be in a position to provide an estimated number of pages potentially responsive to the request within 30 days and to provide an estimated production schedule at that time.

4. The parties propose that they provide the Court with a further status report on or before April 3, 2018, and that the Court defer setting a briefing schedule at this time.

Respectfully submitted,

JESSIE K. LIU, D.C. Bar #472845
United States Attorney

DANIEL F. VAN HORN, D.C. BAR # 924092
Civil Chief

By: ____/s/_____
JEREMY S. SIMON, D.C. BAR #447956
Assistant United States Attorney
Civil Division
555 4th Street, N.W.
Washington, D.C. 20530
(202) 252-2528
Jeremy.Simon@usdoj.gov

Counsel for Defendant

AND

_____/s/_____
Joshua Burday
LOEVY & LOEVY
311 North Aberdeen, 3rd Floor
Chicago, IL 60607
312-243-5900
foia@loevy.com

Counsel for Plaintiff