

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

DEMOCRACY FORWARD FOUNDATION,)	
)	
Plaintiff,)	Civil Action No. 18-0375 (RC)
)	
v.)	
)	
DEPARTMENT OF HOMELAND SECURITY,)	
)	
Defendant.)	

JOINT STATUS REPORT

Plaintiff Democracy Forward Foundation and Defendant Department of Homeland Security, by and through the undersigned counsel, respectfully submit this Joint Status Report in this Freedom of Information Act (“FOIA”) case.

On February 19, 2019, Defendants completed their response to Plaintiff’s request and so advised Plaintiff on March 11, 2019. The Court’s Minute Order of May 16, 2018, required the parties to submit a proposed briefing schedule within 30 days after the government’s final production.

The parties have conferred and believe that it would be premature to propose a briefing schedule at this time. Plaintiff has asked Defendant for additional information regarding the searches that each agency component performed, as well as a *Vaughn* index for Defendant’s withholdings under FOIA Exemption 5, 5 U.S.C. § 552(b)(5). Defendants are considering Plaintiff’s request and intend to respond with a proposal within the next week.

In light of the foregoing, the parties respectfully request that they file a further Joint Status Report on April 4, 2019.

Dated: March 21, 2019

Respectfully submitted,

/s/ Adam Grogg
Adam Grogg (D.C. Bar No. 1552438)
Javier M. Guzman (D.C. Bar No. 462679)

JESSIE K. LIU, DC Bar #472845
United States Attorney

Democracy Forward Foundation
1333 H Street NW
Washington, DC 20005
(202) 448-9090
jguzman@democracyforward.org
agrogg@democracyforward.org

Attorneys for Plaintiff

DANIEL F. VAN HORN, DC Bar #924092
Chief, Civil Division

/s/ Paul Cirino

PAUL CIRINO
Assistant United States Attorney
555 Fourth Street, N.W.
Washington, D.C. 20530
Telephone: (202) 252-2529
Facsimile: (202) 252-2599
paul.cirino@usdoj.gov

Counsel for Defendant