

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

MUSLIM ADVOCATES, et al.

Plaintiffs,

v.

UNITED STATES DEPARTMENT
OF STATE, *et al.*,

Defendants.

Civil Action No. 18-1546 (TSC)

JOINT STATUS REPORT

Defendants, the United States Department of State (“DOS”), United States Department of Homeland Security (“DHS”), United States Customs and Border Protection (“CBP”), United States Citizenship and Immigration Services (“USCIS”) and Plaintiffs, Muslim Advocates and Center for Constitutional Rights (“CCR”), each by its undersigned counsel, submit this joint status report in this Freedom of Information Action in response to the Court’s Minute Order dated February 26, 2019.

1. Defendants provide the following updates regarding their responses to Plaintiffs’ FOIA requests.

a. DOS:

DOS made a production of non-exempt, responsive material to Plaintiffs on February 25, 2018. DOS intends to continue providing rolling productions of non-exempt, responsive material to Plaintiffs at a monthly rate, with the next production on March 25, 2019.

b. USCIS:

USCIS has finished its initial search, and has almost completed its review of approximately 2,700 remaining pages of potentially responsive records. Assuming that no additional searches are deemed necessary, USCIS still anticipates being able to begin rolling productions of responsive, non-exempt USCIS records starting no later than April 2019.

c. CBP:

CBP has concluded its search for responsive documents and has identified five pages of responsive documents; it released redacted versions of the responsive documents to Plaintiffs on February 5, 2019. Along with responsive records, CBP also provided to Plaintiffs a memorandum from a CBP official explaining the context and nature of the result of CBP's search for responsive records.

d. DHS:

DHS has completed its search and the processing of the approximately 3,709 potentially responsive pages. At this juncture, DHS has begun review of the pages processed but is unable to provide an estimated release date. DHS will provide an estimated release date in the next joint status report. DHS anticipates that it will make a single production.

2. The parties intend to consult again as productions proceed and propose that they file another joint status report on May 10, 2019 pursuant to the Court's Minute Order dated February 26, 2019.

Dated: March 11, 2019

Respectfully submitted,

/s/Sirine Shebaya

Sirine Shebaya (D.C. Bar # 1019748)

Nimra H. Azmi*^o

MUSLIM ADVOCATES

P.O. Box 66408

Washington, D.C. 20035

(202) 897-2622

sirine@muslimadvocates.org

nimra@muslimadvocates.org

Baher Azmy*

Diala Shamas*

CENTER FOR CONSTITUTIONAL
RIGHTS

666 Broadway, 7th Floor

New York, NY 10012

(212) 614-6426

dshamas@ccrjustice.org

*admitted *pro hac vice*

^oadmitted in New York only; practice
limited to federal courts and agencies

Counsel for Plaintiffs

JESSIE K. LIU, DC Bar #472845

United States Attorney

DANIEL F. VAN HORN, DC Bar #924092

Chief, Civil Division

By: _____ /s/

W. MARK NEBEKER, DC Bar #396739

Assistant United States Attorney

555 4th Street, N.W.

Washington, DC 20530

(202) 252-2536

mark.nebeker@usdoj.gov

Counsel for Defendants