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5 Counsel for Plaintiff CORA CURRIER

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7 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
8 **SAN FRANCISCO DIVISION**

9 CORA CURRIER,

10 Plaintiff,

11 v.

12 DEPARTMENT OF HOMELAND SECURITY,  
DEPARTMENT OF STATE,  
DEPARTMENT OF JUSTICE, and  
DEPARTMENT OF DEFENSE,

13 Defendants.

Case No. 3:17-cv-01799-JSC

JOINT STATUS REPORT

Date: October 26, 2017

Time: 1:30 p.m.

Place: Courtroom F, 15th Floor

Magistrate Judge Jacqueline Scott Corley

14  
15 Plaintiff Cora Currier and Defendants—the Department of State (DOS), the Department of  
16 Justice (DOJ), the Department of Defense (DOD), and the Department of Homeland Security (DHS)—  
17 respectfully submit this Joint Status Report pursuant to the Court’s Minute Order of September 28, 2017  
18 [ECF No. 33].<sup>1</sup>

19 1. This case arises from multiple Freedom of Information Act (FOIA) requests submitted by  
20 Plaintiff, dated February 1, 2017, and April 3, 2017. The requests seek records from the four defendant  
21 agencies, including from multiple offices and/or sub-agencies within them.

22 2. The parties have been filing periodic joint status reports and participating in period status  
23 conferences since the Court denied Plaintiff’s Motion for Preliminary Injunction on August 24, 2017.  
24 The parties also have been conferring about the scope and prioritization of Plaintiff’s FOIA requests.  
25

26 <sup>1</sup> The components of DOJ and DHS that are processing Plaintiff’s requests are: (1) the Executive Office  
27 of United States Attorneys (“EOUSA”); (2) the Federal Bureau of Investigation (“FBI”); (3) the Office  
of Legal Counsel (“OLC”); (4) the Office of Information Privacy (“OIP”); (5) the U.S. Marshals Service  
28 (“USMS”); (6) the DHS Privacy Office (“DHS-PRIV”); (7) U.S. Customs and Border Protection (“CBP”);  
and (8) DHS’s Office of the Inspector General (“DHS-OIG”).

1 3. Updates since the last joint status conference, held on September 28, 2017, are below.

2 **Production Updates and Status**

3 4. DOJ-EOUSA: Interagency review of records from EOUSA remains ongoing. These  
4 records require review by multiple agencies. EOUSA has received responses from DHS-CBP, DHS-  
5 PRIV, and DOJ's Criminal Division. Consultations with DOJ-OIP and the Civil Division of DOJ  
6 remain outstanding. Although the timing of the consultations depends on factors outside EOUSA's  
7 control, EOUSA anticipates that EOUSA's processing of Plaintiff's FOIA requests to EOUSA will be  
8 completed by the end of the calendar year.

9 5. DOJ-OLC: Since the parties' last joint status report, OLC has completed its initial  
10 manual responsiveness review and deduplication of the potentially responsive records that it has not  
11 already released to Plaintiff. This review reduced the volume of potentially responsive records requiring  
12 further review for responsiveness and potential withholdings from over 26,000 documents to  
13 approximately 4,800 documents. As previously indicated, OLC anticipates beginning rolling  
14 productions of the remaining records no later than October 31, 2017, and commits to rolling productions  
15 on approximately a monthly basis thereafter.

16 6. DOJ-OIP: OIP has now completed its initial manual responsiveness review of over  
17 16,500 potentially responsive documents collected in response to Plaintiff's FOIA requests to OIP.  
18 Following this review, approximately 2,000 documents are still considered potentially responsive and  
19 require further review for responsiveness and potential withholdings. OIP anticipates making its next  
20 production by the end of this week. OIP also is actively reviewing records received from other agencies  
21 in response to requests for interagency review.

22 7. DOD: DOD made a release on October 3, 2017. DOD anticipates making its next  
23 release shortly.

24 8. DOS: DOS is making rolling releases on approximately a monthly basis. Since the last  
25 status conference, DOS made a release on October 10, 2017. For that release, DOS processed over 300  
26 pages, which resulted in 34 pages being released in full or in part.

27 9. DHS-PRIV: DHS-PRIV is making rolling releases on approximately a monthly basis.  
28 Since the last status conference, DHS-PRIV made a release on October 16, 2017. For that release, DHS-  
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1 PRIV reviewed 522 pages, resulting in 30 pages being released in full, 106 pages being released in part,  
2 42 pages being withheld in full, and 276 pages being deemed duplicative or non-responsive. DHS-PRIV  
3 also sent 68 pages of records to other agencies for interagency review.

4 10. DHS-CBP: DHS-CBP is making rolling productions on approximately a monthly basis.  
5 Since the last status report, CBP made a release on October 24, 2017, releasing 250 pages in full or in  
6 part and withholding 19 pages in full.

7 11. The status for DOJ-USMS, DHS-OIG, and DOJ-FBI remains unchanged from the  
8 parties' last joint status report.

9 Date: October 25, 2017

Respectfully submitted,

10 CHAD A. READLER  
11 Acting Assistant Attorney General

12 BRIAN STRETCH  
13 United States Attorney

14 ELIZABETH J. SHAPIRO  
15 Deputy Branch Director

16 /s/ Matthew J. Berns  
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**LOCAL RULE 5-1(i) ATTESTATION**

I certify that I have obtained Matthew J. Berns’s concurrence in the filing of this document.

/s/ Marcia Hofmann  
Marcia Hofmann