

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

<p>ELECTRONIC PRIVACY INFORMATION CENTER,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>UNITED STATES DEPARTMENT OF JUSTICE,</p> <p style="text-align: center;">Defendant.</p>
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No. 1:06-CV-96 (HHK)

<p>AMERICAN CIVIL LIBERTIES UNION et al.,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>UNITED STATES DEPARTMENT OF JUSTICE,</p> <p style="text-align: center;">Defendant.</p>
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No. 1:06-CV-214 (HHK)

**CONSOLIDATED CASES**

**JOINT PROPOSED STIPULATION REGARDING  
PROCESSING OF OFFICE OF LEGAL COUNSEL MEMORANDA**

On October 31, 2008, this Court ordered Defendant Department of Justice (“DOJ”) to submit ten memoranda of the Office of Legal Counsel (“OLC”) to the Court for *in camera* review to determine the propriety of the DOJ’s withholding of those documents. *Elec. Privacy Info. Ctr. v. Dep’t of Justice*, 584 F. Supp. 2d 65, 83 (D.D.C. 2008). On September 15, 2009, Plaintiffs submitted a supplemental memorandum to the Court, noting the recent disclosure by the DOJ of a report prepared by the Offices of the Inspectors General of several agencies that, Plaintiffs maintained, pertained to the Court’s *in camera* review of the ten OLC memoranda. (dkt. no. 70). The DOJ responded to Plaintiffs’ submission on December 17, 2009 by

committing to review four of the ten OLC memoranda to determine whether, in light of the recently released report, “disclosure of any segregable portions of the memoranda is required or appropriate.” (dkt. no. 47).

The DOJ’s review of the four memoranda is not yet complete. The parties hereby stipulate, subject to approval by the Court, that the DOJ will complete its review of the four memoranda and disclose any segregable portions by March 18, 2011.

January 14, 2011

Respectfully submitted,

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/s/ Marcia Berman  
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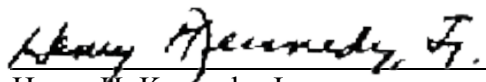
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**SO ORDERED.**

  
Henry H. Kennedy, Jr.  
United States District Judge