

3. OMB has completed a keyword search for records responsive to Plaintiff's FOIA request. That search located 1392 potentially responsive records. OMB has further reviewed approximately 700 of those records and determined that a large percentage of them are not in fact responsive. Based on the information currently available, OMB anticipates completing its response to Plaintiff's FOIA request by early September and making one interim release of records before then.

4. The parties have conferred and agreed that Plaintiff's Complaint against DOJ only seeks to compel the release of records from DOJ's Office of Legal Counsel ("OLC"). Accordingly, the parties believe that it will be unnecessary for them to litigate the exhaustion issue raised by DOJ as the First Defense in its Answer.

5. OLC has received numerous FOIA requests relating to the same general subject matter as Plaintiff's FOIA request. To facilitate efficient processing of all of these FOIA requests, OLC has conducted a broad keyword search designed to capture any records responsive to any of the requests. That search (over-inclusive by design) retrieved 26,157 potentially responsive records, including emails, email attachments, and stand-alone records. OLC continues to search for responsive paper records, but anticipates that the volume of responsive paper records, if any, is small. OLC has begun to review these records to determine how many are in fact responsive (either to Plaintiff's FOIA request or to the FOIA requests submitted by others seeking records related to the same general subject matter). Once that manual review has progressed further, OLC will be in a better position to provide estimated release dates.

6. At this time, neither DOJ nor OMB anticipates seeking an *Open America* stay, and the parties agree that it is too early to determine whether they anticipate summary judgment briefing.

7. The parties respectfully propose that they file Joint Status Reports on the second Tuesday of every month, beginning on August 8, 2017, until further Order of the Court.

Dated: July 6, 2017

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