

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

THE PROTECT DEMOCRACY PROJECT,)	
)	CONSOLIDATED CASES
Plaintiff,)	
)	
v.)	No. 1:17-cv-00814-APM
)	
OFFICE OF MANAGEMENT AND BUDGET,)	
)	
Defendant.)	
)	
)	
THE PROTECT DEMOCRACY PROJECT,)	
)	
Plaintiff,)	
)	
v.)	No. 1:17-cv-00815-APM
)	
DEPARTMENT OF JUSTICE,)	
)	
Defendant.)	
)	

JOINT STATUS REPORT

The United States Department of Justice (“DOJ”) and the Office of Management and Budget (“OMB”) (collectively, “Defendants”) and Plaintiff The Protect Democracy Project respectfully submit this Joint Status Report pursuant to the Court’s Minute Order of July 10, 2017. The parties report as follows:

1. On May 2, 2017, Plaintiff initiated actions under the Freedom of Information Act (“FOIA”) against OMB and DOJ. The two cases were subsequently consolidated pursuant to this Court’s Minute Order of June 12, 2017.
2. Defendants filed their Answers on June 21, 2017 [ECF Nos. 12 & 13].

3. OMB has completed a keyword search for records responsive to Plaintiff's FOIA request. That search located 1392 potentially responsive records. OMB has completed its processing of 700 of the 1392 potentially responsive records and determined that only ten pages are responsive to Plaintiff's FOIA request. On August 7, 2017, OMB released those ten pages in full. Based on the information currently available, OMB anticipates completing its response to Plaintiff's FOIA request by early September.

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.

6. On August 2, 2017, OLC released in full one record responsive to Plaintiff's request. OLC informed Plaintiff that this release constituted the completion of OLC's search for responsive final legal advice documents.

7. OLC has begun a manual review of the thousands of potentially responsive records located to date in order 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 OLC's manual review has progressed further, OLC will be in a better position to provide an estimated production schedule.

8. The parties will continue to file Joint Status Reports on the second Tuesday of every month, until further Order of the Court, pursuant to the Court's Minute Order of July 10, 2017.

Dated: August 8, 2017

/s/ Allison F. Murphy
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Respectfully submitted,

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