

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

**THE JAMES MADISON PROJECT, NOAH
SHACHTMAN, and BETSY WOODRUFF,**

Plaintiffs,

v.

**DEPARTMENT OF HOMELAND
SECURITY,**

Defendant.

Civil Action No. 17-1281

JOINT STATUS REPORT

On October 11, 2017, the Court ordered the parties to submit a joint status report updating the Court as to the status of the case. Pursuant to that Court Order, the Parties submit the instant Joint Status Report as follows:

1. This action arises under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, and involves three largely identical FOIA requests submitted to the Transportation Security Administration (“TSA”), U.S. Customs and Border Protection (“CBP”) and U.S. Citizenship and Immigration Services (“USCIS”), respectively. The FOIA requests seek certain documentation concerning I-407 forms, which permit the abandonment of lawful permanent resident status in the United States.

2. On October 11, 2017, pursuant to the parties’ Joint Status Report of October 10, 2017, this Court ordered that Defendants U.S. Citizenship and Immigration Services (“USCIS”) and U.S. Customs and Border Protection (“CBP”) provide their first production of non-exempt portions of responsive records on or before November 6, 2017. The Court further ordered that

Defendants will make a second production of non-exempt portions of responsive records on December 7, 2017, if needed.

3. In accordance with this Court's Order, on November 6, 2017 CBP provided Plaintiffs with a production of responsive, non-exempt documents, totaling 171 pages. On that same day, USCIS notified Plaintiffs that the agency had not yet located any records responsive to the instant request.

4. Both Defendants' review processes remain ongoing, however. In accordance with this Court's order, Defendants will produce to Plaintiffs those responsive, non-exempt records which have been fully processed on or before December 7, 2017. Defendants anticipate that they will complete their review and production processes on or before that date. However, the parties agree to meet and confer in the event that one or both of Defendants may require more time to complete their production process after December 7, 2017.

5. Pursuant to the Court's Order of October 11, 2017, the parties will file further Joint Status Reports every 60 days, with the next such Joint Status Report to be filed on January 5, 2018.

Dated: November 6, 2017

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