

**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

Pursuant to the Court’s Order of October 11, 2017, 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”). The FOIA requests seek certain documentation concerning I-407 forms, which permit the abandonment of lawful permanent resident status in the United States.

2. Since the parties filed their previous Joint Status Report, CBP provided a further production of responsive, non-exempt documents, totaling 59 pages. USCIS also provided a production of responsive, non-exempt documents, totaling 4 pages.

3. When they made those productions, on December 7, 2017, both CBP and USCIS informed Plaintiffs that their search and review process had been completed, such that the December 7, 2017 release represented the final productions concerning Plaintiffs’ FOIA request.

4. The parties wish to meet and confer to discuss possible next steps in the case, including the potential need for a briefing schedule, or whether a resolution may be possible which would not require further involvement of the Court.

5. Accordingly, the parties respectfully request that they file a further Joint Status Report on or before February 2, 2018, which would serve to update the Court as to the status of the case, and set forth what next steps, such as a briefing schedule, may be required.

Dated: January 5, 2018

Respectfully submitted,

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