

**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 January 5, 2018, 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. On January 5, 2018 the parties submitted a Joint Status Report, explaining that Defendants had completed their processing of Plaintiff’s FOIA request. The parties also represented that they wished to meet and confer about possible next steps in the case.

3. Since that time the parties have conferred and agree that both sides would benefit from additional time for discussions, before determining whether motions practice will be

necessary. Specifically, Defendants have agreed to provide Plaintiffs with draft search declarations, so that Plaintiffs can determine which issues, if any, will require motions practice.

4. Accordingly, the parties jointly propose that they file another Joint Status Report on or before April 13, 2018, when the parties anticipate that Plaintiffs will have reviewed the draft search declarations. This joint status report will 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: February 1, 2018

Respectfully submitted,

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