



3. Since that time, Defendant has provided Plaintiffs with draft search declarations from TSA, CBP and USCIS, respectively. Plaintiffs have reviewed the draft declarations and concur that TSA has met its obligations under the FOIA, such that Plaintiffs will drop any further challenge concerning TSA. In addition, Plaintiffs will not assert any further challenge to the sufficiency of CBP's or USCIS's searches.

4. However, Plaintiffs do intend to challenge certain denials and redactions made by CBP and USCIS in responding to Plaintiffs' request. The parties agree that these issues are ripe for summary judgment.

5. Accordingly, the parties jointly request that the Court enter the following briefing schedule:

- a. On or before June 15, 2018 - Defendant files its Motion for Summary Judgment
- b. On or before July 16, 2018- Plaintiffs file their Response
- c. On or before August 17, 2018- Defendant files its Reply

Dated: April 13, 2018

Respectfully submitted,

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