

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

THE JAMES MADISON PROJECT, NOAH)	
SHACHTMAN, and BETSY WOODRUFF,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 17-1281
)	
DEPARTMENT OF HOMELAND)	
SECURITY,)	
)	
Defendant.)	

JOINT STATUS REPORT

The parties submit the instant Joint Status Report as follows:

1. Following the conference call with the Court on October 3, 2018, the parties have reached agreement concerning the response of Defendant U.S. Citizenship and Immigration Services (“USCIS”) to Plaintiffs’ instant FOIA request.

2. Specifically, Defendant agrees to conduct a search for and process the I-407 forms for the dates specified in Plaintiffs’ FOIA request. USCIS will redact all fields within the I-407 forms, except fields 6 and 10 (country of citizenship/nationality, and reasons for abandoning lawful status). USCIS will review the content of fields 6 and 10 and will agree to only redact information therein which would tend to identify the signatory, such as name, telephone number, address, and other personally identifiable information.

3. In the interest of amicably resolving the litigation, the parties have agreed that, in return for USCIS’s efforts outlined above, Plaintiffs will not raise any further challenges to USCIS’s FOIA response in this matter.

4. Because USCIS is only beginning the search process now, the agency does not yet know how long the processing and production effort will take. Accordingly, the parties have agreed to meet and confer to propose a production schedule to the court.

5. The parties respectfully suggest that the Court order the parties to propose a production schedule on or before October 19.

Dated: October 5, 2018

Respectfully submitted,

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/s/ Michael L. Drezner
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