## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

CITIZENS FOR RESPONSIBILITY AND ETHICS IN WASHINGTON,	)	
Plaintiff,	)	
v.	)	Civil Action No: 19-3127 (CKK)
U.S. DEPARTMENT OF HOMELAND SECURITY, et al.,	)	
Defendants.	) ) )	

## **STATUS REPORT**

Pursuant to the Court's order dated November 25, 2019, the parties, by and through undersigned counsel, report to the Court as follows.

- 1. The Complaint in this action under the Freedom of Information Act ("FOIA") was filed on October 18, 2019 against the United States Department of Homeland Security ("DHS") and the Department of State ("State"). Defendant answered the Complaint on November 25, 2019. Four FOIA requests are at issue in this lawsuit, one to the United States Secret Service ("Secret Service"), a component of DHS, and three to State.
- 2. The request to the Secret Service, made on August 28, 2019, sought all communications between January 1, 2019 and the present that relate to or support President Trump's assertion that the Secret Service preferred the Trump National Doral resort as a site for the G-7 summit in 2020. (Compl. ¶ 15) On November 15, 2019, the Secret Service provided a final response to that request, which consisted of the production of one responsive record with

redactions. Accordingly, the Secret Service's processing of the request is completed. Plaintiff has no outstanding issues with the Secret Service's response to this request.

- 3. The Complaint identifies three requests directed to State. (Compl. ¶¶ 19, 23, 27) State has begun its search for records responsive to Plaintiff's requests. State expects to complete its search by February 13, 2020. Because State does not yet know the volume and scope of potentially responsive records to process, it is not in a position at this time to estimate a completion date or propose a rolling production schedule. The parties will confer on a production schedule once State has completed its search. State does not anticipate at this time that it will be filing a motion for an *Open America* stay.
- 4. The parties anticipate that *Vaughn* indices will be necessary in the event summary judgment motions are necessary to resolve this litigation.
- 5. The parties request that the Court defer setting a briefing schedule at this time and that the parties provide a further status report on or before February 28, 2020.

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**AND** 

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