

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

ELECTRONIC PRIVACY INFORMATION CENTER	)	
	)	
Plaintiff,	)	
v.	)	No. 1:14-cv-00776 (BAH)
	)	
DEPARTMENT OF THE ARMY	)	
	)	
Defendant.	)	

**JOINT STATUS REPORT AND PROPOSED SCHEDULE**

Pursuant to the Court’s Minute Order on August 20, 2014, Plaintiff Electronic Privacy Information Center (“EPIC”) and Defendant United States Department of the Army (“Army”) have conferred and hereby jointly submit the following status report and proposed schedule to govern this action.

1. Plaintiff filed this Freedom of Information Act (“FOIA”) action on May 6, 2014. This action concerns a FOIA request (“EPIC’s FOIA Request”) made by EPIC on November 1, 2013.
2. EPIC’s FOIA Request asked for the following agency records:
  - a. All technical specifications, contracts, and statements of work for JLENS systems purchased for or contracted for by the Department of the Army, including but not limited to contracts with Ratheon;
  - b. All instructions, policies, and procedures concerning the use of JLENS to collect, store, transmit, reproduce, retain, degrade, or delete images and sounds;
  - c. All documents detailing the technical specifications of visual and auditory surveillance hardware on JLENS aerostats; and
  - d. All contracts and statements of work entered into by the Department of the Army for JLENS hardware, software, or training that concerns the ability of

JLENS to collect, obscure, degrade, store, transmit, reproduce, retain, or delete images and sounds.

3. The Army has represented that it has completed its production of records responsive to EPIC's FOIA request.

4. Because this matter arises under FOIA, Local Rule 16.3(b)(9) exempts this suit from the requirements of Local Rules 16(b) and 26(f) of the Federal Rules of Civil Procedure.

5. The parties agree that remaining issues will be resolved by motions. The parties accordingly propose the following schedule:

Defendant's Vaughn Index and Motion for Summary Judgment:	No later than December 19, 2014
Plaintiff's Opposition and Cross-Motion:	No later than January 19, 2015
Defendant's Reply and Opposition:	No later than February 9, 2015
Plaintiff's Reply:	No later than March 2, 2015

6. In the event that the parties are able to resolve or further limit the issues before the Court, the parties will promptly inform the Court and propose any appropriate modifications to the schedule.

Date: October 24, 2014

Respectfully submitted,

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