UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

ELECTRONIC PRIVACY
INFORMATION CENTER

Plaintiff,

v.

Civil No. 15-cv-00289 CKK

DEPARTMENT OF HOMELAND SECURITY,

Defendant.

JOINT STATUS REPORT

Pursuant to this Court's order dated May 7, 2015, Plaintiff Electronic Privacy Information Center ("Plaintiff" or "EPIC"), and Defendant, the Department of Homeland Security ("DHS" or "the Department"), by and through their undersigned counsel, report as follows the status of this Freedom of Information Act ("FOIA") case:

(1) Status of Defendant's Production of Responsive Records:

Defendant, DHS, performed a search that resulted in 111 pages of responsive documents. Of those pages, 8 pages were available online, 20 pages were released in their entirety, 33 pages were partially released, and 50 pages were withheld in their entirety. All responsive records were produced to Plaintiff, EPIC, on May 11, 2015.

- (2) EPIC has reviewed all documents produced by DHS and has requested a *Vaughn* Index from DHS in order to determine the scope of issues in dispute.
- (3) DHS will produce a *Vaughn* declaration to EPIC of all documents withheld in full on or before June 22, 2015.

Accordingly, the parties recommend that they file another joint status report on June 29, 2015, in which to suggest a proposed schedule for further proceedings in this case.

Respectfully submitted,

MARC ROTENBERG, D.C. BAR # 422825 EPIC President

Alan Butler, D.C. BAR # 1012128 EPIC Senior Counsel

/s/ Jeramie D. Scott

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