

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

ELECTRONIC PRIVACY INFORMATION CENTER)	
)	
Plaintiff,)	Case No. 1:10-cv-00196-BAH
)	
v.)	
)	
NATIONAL SECURITY AGENCY)	
)	
)	
Defendants.)	

JOINT REPORT

1. Pursuant to this Court’s Order, dated July 7, 2011, undersigned counsel in the above-captioned matter submit the following Joint Status Report on the status of this matter and a proposed schedule for completion of a *Vaughn* index and/or dispositive motions.

2. On February 4, 2010, Plaintiff Electronic Privacy Information Center brought suit in the above-captioned matter. Plaintiff’s claims arise out of several requests for documents from the National Security Agency and made pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, et seq.

3. Defendants submitted a Partial Motion to Dismiss on March 25, 2010. The National Security Agency submitted an Answer on that same date.

4. On July 7, 2011, this Court granted Defendants partial motion to dismiss, dismissing Counts III and IV of the Complaint and dismissing the National Security Council from this action.

5. Undersigned counsel for the parties have conferred and jointly propose the following schedule for the litigation:

- August 30, 2011: Last day for Supplemental Production of Responsive Documents.
- October 11, 2011: Defendant to file its motion for summary judgment and supporting memorandum and documentation (including, if necessary, a *Vaughn* index).
- November 11, 2011: Plaintiff to file its cross-motion for summary judgment, and its memorandum in support of Plaintiff's cross-motion for summary judgment/in opposition to Defendant's motion for summary judgment.
- December 8, 2011: Defendant to file its memorandum in opposition to Plaintiff's cross-motion for summary judgment/reply memorandum in support of Defendant's motion for summary judgment.
- December 22, 2011: Plaintiff to file its reply memorandum in support of Plaintiff's cross-motion for summary judgment.

DATED: July 20, 2011

Respectfully Submitted,

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Assistant Attorney General

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United States Attorney

ELIZABETH J. SHAPIRO
Deputy Director

/s/Joshua Wilkenfeld
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing filing has been furnished via CM/ECF to counsel for Plaintiff, John Verdi, Esq., of the Electronic Privacy Information Center, on this 20th day of July 2011.

/s/ Joshua Wilkenfeld

Joshua Wilkenfeld