

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JASON LEOPOLD,)
BUZZFEED INC.,)
)
Plaintiffs,)
)
v.)
)
U.S. DEPARTMENT OF JUSTICE,)
DOJ OFFICE OF ATTORNEY GENERAL,)
DOJ DEPUTY ATTORNEY GENERAL,)
DOJ OFFICE OF SPECIAL COUNSEL,)
)
Defendants.)

Case No. 19-cv-957

PLAINTIFFS’ REQUEST FOR EXPEDITED PRELIMINARY INJUNCTION HEARING

Plaintiffs respectfully request that the Court schedule a hearing on Plaintiffs’ Motion for Preliminary Injunction, which seeks release of the Mueller Report by the presumptive April 18, 2019, FOIA deadline. Plaintiffs request that the Court schedule the hearing for April 15, 2019, so as to allow Defendants time to respond to the motion and to finish processing the request by April 18 if the Court grants Plaintiffs’ motion.

STATEMENT OF FACTS

As set forth in the Complaint, its exhibits, and the Declaration of Jason Leopold submitted in support of Plaintiffs’ Motion for Preliminary Injunction, Defendants have indicated that they will not complete processing of Plaintiffs’ FOIA request for the Mueller Report until some unspecified date in the future more than 10 business days beyond the statutory deadline for *non*-expedited requests. As explained in Plaintiffs’ Motion for Preliminary Injunction, there is no legal justification for Defendants’ delay, and the Court should order Defendants to comply with the request by April 18, 2019. The contents of the Mueller Report are among the most newsworthy information in modern American history, and there is an urgency to inform the

public of them as quickly as possible. That is especially true because the Attorney General has already characterized the contents of the report and the President of the United States has made claims that the Report exonerates him of all wrongdoing in connection with the scope of the investigation.

CONCLUSION

For these reasons, Plaintiffs respectfully request that the Court schedule Plaintiffs' Motion for Preliminary Injunction for hearing on April 15, 2019.

DATED: April 4, 2019

Respectfully Submitted,

/s/ Matthew Topic

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