

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

_____)	
ELECTRONIC PRIVACY)	
INFORMATION CENTER)	
1718 Connecticut Avenue, N.W.)	
Suite 200)	
Washington, D.C. 20009,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. <u>17-163</u>
)	
OFFICE OF THE DIRECTOR OF)	
NATIONAL INTELLIGENCE)	
Washington, DC, 20511,)	
)	
Defendant.)	
_____)	

PROPOSED BRIEFING SCHEDULE

Plaintiff Electronic Privacy Information Center and Defendant Office of the Director of National Intelligence (“ODNI”), hereby submit for the Court’s consideration the following Proposed Briefing Schedule.¹

Since the commencement of this FOIA lawsuit, the parties have conferred and discussed a schedule for further proceedings. Plaintiff’s FOIA request seeks one record (*see* Amended Complaint ¶ 21), and the ODNI possesses the record responsive to the request. Accordingly, the parties hereby move the Court to enter an order imposing the following Proposed Briefing Schedule:

¹ On March 17, 2017, the Court entered a Minute Order directing the parties to meet, confer, and submit a proposed briefing schedule on or before April 3, 2017. Pursuant to that order, the parties now submit this proposed briefing schedule.

(1) The ODNI shall process and release all non-exempt portions of the record responsive to EPIC's FOIA Request by no later than May 3, 2017; and

(2) The parties shall file a joint status report by no later than May 17, 2017, updating the court on whether any further briefing will be necessary in the case.

The adoption of the proposed schedule will facilitate the efficient resolution of this lawsuit and conserve the Court's resources. Accordingly, the parties respectfully request that the Court enter the above-described schedule for further proceedings.

A proposed order reflecting this proposal is attached.

Dated: April 3, 2017

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2017, a copy of the foregoing pleading was filed electronically via the Court's ECF system which sent notification of such filing to counsel of record.

MARC ROTENBERG
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/s/ Alan Butler
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