

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

ELECTRONIC PRIVACY INFORMATION CENTER,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

Defendant.

Civ. Action No. 19-810 (RBW)

**JOINT STATUS REPORT AND MOTION TO ADOPT
A SCHEDULE FOR FURTHER PROCEEDINGS**

Plaintiff Electronic Privacy Information Center (“EPIC”) and Defendant U.S. Department of Justice (“DOJ”), by and through undersigned counsel, respectfully submit this Joint Status Report and Motion to Adopt a Schedule for Further Proceedings.

1. On September 12, 2019, the DOJ made a supplemental production of records to EPIC in response to Category 2 of EPIC’s November 5, 2018 Freedom of Information Act (“FOIA”) request (“EPIC’s FOIA Request”). EPIC has since completed a review of those records.

2. The parties are currently engaged in discussions to narrow the scope of issues in dispute with respect to Categories 2–7 of EPIC’s FOIA Request.

3. The parties respectfully seek an additional three weeks to reach agreement concerning next steps in this litigation.

4. Accordingly, the parties hereby move the Court to enter an order adopting the following proposed schedule:

- The parties shall file a Joint Status Report on or before October 10, 2019, which shall include a proposed schedule for further proceedings if necessary.

The adoption of this schedule will facilitate the efficient resolution of this lawsuit and conserve the Court's resources.

5. On the basis of the foregoing, the parties do not believe that the status conference currently scheduled for September 20, 2019, is necessary.

Dated: September 19, 2019

Respectfully Submitted,

MARC ROTENBERG
EPIC President and Executive Director

JOSEPH H. HUNT,
Assistant Attorney General
Civil Division

ALAN BUTLER,
EPIC Senior Counsel
butler@epic.org

ELIZABETH SHAPIRO,
Deputy Director
Federal Programs Branch

/s/ John Davission

JOHN DAVISSION,
EPIC Counsel

By: /s/ Courtney D. Enlow

COURTNEY D. ENLOW,
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Room 12102
Washington, D.C. 20005
(202) 616-8467
courtney.d.enlow@usdoj.gov

ELECTRONIC PRIVACY
INFORMATION CENTER
1519 New Hampshire Ave NW
Washington, D.C. 20036
(202) 483-1140 (telephone)
(202) 483-1248 (facsimile)

Attorneys for Plaintiff EPIC

Counsel for Defendant