

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

ELECTRONIC PRIVACY INFORMATION
CENTER,

Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE
NATIONAL SECURITY DIVISION,

Defendant.

Civil Action No. 17-2274-RC

JOINT MOTION TO VACATE THE BRIEFING SCHEDULE

Plaintiff, the Electronic Privacy Information Center (“EPIC”), and Defendant, U.S. Department of Justice, National Security Division (“NSD”), hereby request that the Court vacate the current briefing schedule for cross summary judgment motions and provide the parties with time to negotiate a settlement on fees and costs.

The NSD released to EPIC a reprocessed version the document at issue in this case on January 8, 2018. After reviewing the reprocessed document, EPIC has determined that there remains no outstanding issue with respect to the agency’s assertion of FOIA exemptions (b)(1) and (b)(3) or failure to release reasonably segregable material in the record. Therefore, the only remaining issue is EPIC’s claim for attorney’s fees and costs. Accordingly, the parties request that the Court vacate the current briefing schedule and adopt the following schedule:

- The parties shall file a Joint Status report with the Court no later than March 2, 2018, detailing the status of settlement negotiations and whether further briefing is necessary.

January 25, 2018

Respectfully submitted,

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

/s/ Alan Butler

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