

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

ELECTRONIC PRIVACY)	
INFORMATION CENTER,)	
)	
Plaintiff,)	
)	
v.)	Civil No. 15-cv-00289 CKK
)	
DEPARTMENT OF HOMELAND SECURITY,)	
)	
Defendant.)	

JOINT STATUS REPORT

Pursuant to this Court’s order dated June 30, 2015, Plaintiff, Electronic Privacy Information Center (“Plaintiff” or “EPIC”), and Defendant, the Department of Homeland Security (“DHS” or “the Department”), by and through their undersigned counsel, report as follows the status of this Freedom of Information Act (“FOIA”) case:

(1) As explained in the Joint Status Report filed June 29, 2015, DHS produced to EPIC a *Vaughn* Index on June 22, 2015, and EPIC reviewed the *Vaughn* Index and requested additional information from the agency regarding the document entitled “Passive Methods Quad Chart.

(2) DHS had agreed to review EPIC’s request and, to the extent that DHS agrees that additional information is needed, to produce a revised *Vaughn* declaration to EPIC that accounts for the above referenced document on or before July 13, 2015.

(3) Following submission of the Joint Status Report on June 29, 2015, EPIC requested DHS to provide additional information in a supplemental *Vaughn* index concerning additional information withheld from plaintiff that EPIC had not previously requested be included in a Vaughn index.

(4) DHS agreed and has informed EPIC it can produce the supplemental Vaughn index of additional information by July 27, 2015.

(5) EPIC will determine by August 3, 2015 whether it wishes to pursue the litigation.

Accordingly, the parties recommend that they file another joint status report on August 5, 2015, in which to suggest a proposed schedule for further proceedings in this case.

Respectfully submitted,

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

Alan Butler, D.C. BAR # 1012128
EPIC Senior Counsel

/s/ Jeramie D. Scott
Jeramie D. Scott, D.C. BAR # 1025909
Electronic Privacy Information Center
1718 Connecticut Ave. NW, Suite 200
Washington, DC 20009
(202) 483-1140
jscott@epic.org

Counsel for Plaintiff

VINCENT H. COHEN, JR. D.C. BAR # 471489
Acting United States Attorney

DANIEL F. VAN HORN, D.C. BAR # 924092
Chief, Civil Division

/s/ Marina Utgoff Braswell
MARINA UTGOFF BRASWELL, D.C. BAR #416587
Assistant United States Attorney
U.S. Attorney's Office, Civil Division
555 4th Street, N.W.
Washington, D.C. 20530
(202) 252-2561
marina.braswell@usdoj.gov

Counsel for Defendant