

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

AMERICAN CIVIL LIBERTIES UNION.,  
*et al.*,

*Plaintiffs,*

v.

CENTRAL INTELLIGENCE AGENCY,

*Defendant.*

Civil Action No. 18-2784 (CJN)

**JOINT STATUS REPORT**

Pursuant to the Court's April 8, 2019, Order, Plaintiffs American Civil Liberties Union, *et al.* and Defendant Central Intelligence Agency hereby submit this Joint Status Report in this Freedom of Information Act ("FOIA") case.

In the parties' April 4, 2019, Joint Status Report, Defendant reported that it had completed its initial collection of potentially responsive records and would soon begin processing the records pursuant to the FOIA. Defendant further reported that it intended to release all non-exempt, responsive records by October 15, 2019. Defendant reports that it will require additional time to finish processing the set of potentially responsive records. Defendant reports that the review process is taking longer than anticipated because of the extent of internal review that has been necessary and the need to maintain consistent treatment of similar documents within the record set. Defendant now anticipates that the documents will be processed and all non-exempt, responsive records subject to FOIA will be produced in January 2020.

On September 23, Defendant notified Plaintiffs of the delay. Plaintiffs requested that this review be completed in a more timely fashion, as the CIA had granted Plaintiffs' request for

expedited processing more than 18 months prior. The agency has represented that it cannot complete review until January 2020.

The parties respectfully propose that they file another joint status report on February 17, 2020.

Respectfully submitted,

/s/ Dror Ladin

Dror Ladin (D.C. Bar No. NY0277)

Hina Shamsi (D.C. Bar No.  
MI0071)

American Civil Liberties Union  
Foundation

125 Broad Street, 18th Floor  
New York, New York 10004

Tel: 212-549-2500

Fax: 212-549-2654

[dladin@aclu.org](mailto:dladin@aclu.org)

[hshamsi@aclu.org](mailto:hshamsi@aclu.org)

Arthur B. Spitzer (D.C. Bar No. 235960)

American Civil Liberties Union  
of the District of Columbia

915 15th Street, NW, 2nd Floor  
Washington, DC 20005

Tel: 202-457-0800

Fax: 202-457-0805

[aspitzer@acludc.org](mailto:aspitzer@acludc.org)

*Attorneys for Plaintiffs*

JOSEPH H. HUNT

Assistant Attorney General

ELIZABETH J. SHAPIRO

Deputy Director

/s/ Joshua Kolsky

JOSHUA KOLSKY

Trial Attorney  
D.C. Bar No. 993430  
United States Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street NW Washington, DC 20005  
Tel.: (202) 305-7664  
Fax: (202) 616-8470  
E-mail: [joshua.kolsky@usdoj.gov](mailto:joshua.kolsky@usdoj.gov)

*Attorneys for Defendant*