

**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 March 30, 2020, 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 case.

As previously reported, Defendant has completed its production to Plaintiffs of all non-exempt, responsive records subject to the FOIA. The parties report that certain issues remain in dispute in this litigation. Accordingly, the parties propose the following schedule for Defendant's Motion for Summary Judgment:

Deadline for Defendant's Motion for Summary Judgment: July 31, 2020

Deadline for Plaintiff's Opposition to Defendant's Motion: August 28, 2020

Deadline for Defendant's Reply in support of Motion: September 18, 2020

The parties respectfully request the Court to set the proposed briefing schedule.

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
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

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

Attorneys for Defendant