



is nearly complete. In the parties' May 11, 2023 submission, the Government reported to the Court that it anticipated completing the interagency consultation process by June 13, 2022. However, the Government was unable to do so because the redacted PPM is currently undergoing final review by classification authorities; the Government now anticipates producing the redacted PPM by June 30, 2023.

3. With regard to the remaining aspects of Plaintiffs' FOIA request, the defendant agencies have commenced their respective searches for potentially responsive documents. Plaintiffs' FOIA request spans three presidential administrations and involves classified information. Although Defendants have made substantial progress, the Government requires additional time to complete their initial searches for potentially responsive materials.

4. After Defendants complete their initial searches, the parties have agreed to meet and confer about potential ways to narrow Plaintiffs' FOIA request, if necessary, in an effort to provide responsive, non-exempt materials to Plaintiffs as expeditiously as possible.

Even though the Court instructed the parties to file joint status reports every 90 days, the parties respectfully propose that they file another joint status report by August 10, 2023.

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Dated: June 20, 2023

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