

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

SUSAN B. LONG, ET AL., )  
)  
Plaintiffs, )  
) CV No. 14-109  
vs. ) Washington, D.C.  
) July 29, 2021  
) 10:38 a.m.  
IMMIGRATION )  
AND CUSTOMS ENFORCEMENT, ET AL., )  
)  
Defendants. )  
\_\_\_\_\_)

TRANSCRIPT OF STATUS CONFERENCE VIA ZOOM PROCEEDINGS  
BEFORE THE HONORABLE AMIT P. MEHTA  
UNITED STATES DISTRICT JUDGE

APPEARANCES:

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APPEARANCES CONTINUED

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Proceedings recorded by mechanical stenography; transcript  
produced by computer-aided transcription

1 PROCEEDINGS

2 COURTRROOM DEPUTY: Good morning, Your Honor.  
3 This is Civil Action 14-109, Susan B. Long, et al., versus  
4 Immigration and Customs Enforcement, et al.

5 Scott Nelson and Michael Kirkpatrick for the  
6 plaintiffs.

7 Kathleene Molen for the defendants.

8 THE COURT: Okay. Counsel, good morning. I hope  
9 everybody is well.

10 So we're back to see where things are and untie  
11 this knot. I've reviewed -- at least quickly skimmed the  
12 filing that the government made yesterday afternoon,  
13 I guess, late yesterday afternoon, which includes a sample  
14 of two of the data dictionaries that were provided by ICE as  
15 samples to the plaintiffs, redactions included, and then  
16 there's an affidavit from Ms. De Castro explaining why the  
17 redactions have been made.

18 Who would like to begin?

19 Mr. Nelson, do you want to react to the  
20 redactions?

21 MR. NELSON: Yes, Your Honor.

22 THE COURT: I mean, I think I know what your  
23 reaction is going to be, but you might as well put it on the  
24 record in your own words and not mine.

25 MR. NELSON: Sure.

1           I think, you know, the first reaction is that if  
2 one looks at the redactions, it's quite evident that they're  
3 not in accordance with the Court's opinion.

4           Among other things, the declarant says that all  
5 full field and table names were redacted, which was not  
6 permitted by the Court's opinion. She also says words that  
7 are related to the table names were redacted, which is  
8 contrary to the testimony of ICE's witness at the  
9 evidentiary hearing that said that plain English terms that  
10 related to table and field names or plain English  
11 translations of those names did not pose problems.

12           The statements in the declaration about code  
13 lookup fields are contrary to the testimony of the witness  
14 at the evidentiary hearing, which was that code lookup  
15 tables in general were benign because they merely gave  
16 translations of the codes used to record data in the fields,  
17 and only a few code names might be problematic to the extent  
18 that they might somehow reveal linkages among fields and  
19 tables. The other redactions, such as the nature of the  
20 data recorded in a particular field, are completely contrary  
21 to the testimony at the evidentiary hearing, where there was  
22 not even any claim that such information would be protected.

23           And then just stepping back a step further, the  
24 fact that these materials date from three years before the  
25 search was conducted and doesn't appear that there's any

1 assurance that they were even complete at the time, and the  
2 witness's declaration about how such data dictionaries were  
3 prepared by the agency, again, shows that the agency's  
4 contention that it didn't need to actually go to the source,  
5 the databases, to provide the complete listings of the  
6 fields and tables that was current at the time of the search  
7 was not correct, and that that search was never adequate.

8 I'm not sure what to suggest at this point.

9 I think one thing that might be productive would be, to the  
10 extent that the Court has any doubt about the nature of the  
11 redactions, the Court could, at a minimum, require that  
12 unredacted copies be provided, as an initial step, to the  
13 Court, so that the Court could look at the nature of the  
14 information redacted and potentially draw some conclusions  
15 about the consistency of the redactions with the Court's  
16 opinion.

17 Another thing, not to belabor a point that has  
18 been previously made, is that, you know, it would be our  
19 position that the Court should now order the agency to  
20 actually provide the complete material from the databases  
21 themselves, rather than relying on whatever incomplete  
22 versions of the listings of fields and tables happen to be  
23 turned up from several years before the search was  
24 conducted.

25 And we had discussed the possibility of bringing

1 in, if the Court believed it was necessary, requests for  
2 current information into the case. We would need, I think,  
3 to have some opportunity to file a supplemental complaint,  
4 I think, would probably be the correct procedure, and we'd  
5 have to make sure that the requests that that would be based  
6 on were fully exhausted. So we might need a few weeks to  
7 get that step taken.

8 I think those are my current thoughts based on  
9 having had a short period of time to look at the materials  
10 that were produced and the government's declaration.

11 THE COURT: Ms. Molen.

12 MS. MOLEN: Yes, Your Honor.

13 I would like to address the issue of the dates  
14 with the data dictionaries.

15 ICE does not, on a regular basis, just print out  
16 data dictionaries. They only do it if they're making  
17 updates or changes to these databases. So this is the  
18 reason why there aren't these data dictionaries just hanging  
19 around; you actually have to have a reason to generate these  
20 data dictionaries.

21 And out of the 18 files that we couldn't read last  
22 time, there were some files from 2014. I mean, so they did  
23 search for that information in 2014, but it's just they do  
24 not generate these data dictionaries unless there is a  
25 reason to and if they're creating an update for changes to

1 the database.

2 THE COURT: What does it mean to generate a data  
3 dictionary? In other words, I mean --

4 MS. MOLEN: These Excel spreadsheets that --

5 THE COURT: I know, but are you talking about  
6 printing it out or are you talking about some electronic way  
7 of producing them?

8 MS. MOLEN: My understanding is every time they're  
9 making a change to this database, they have to record the  
10 change -- they explained the testing that occurs to the  
11 change -- and at times when they make these changes, they  
12 attach a data dictionary, not always, but sometimes, and  
13 these data dictionaries vary in size and -- depending on  
14 what is being updated in the database.

15 And so then they have these documents where there  
16 are these Excel spreadsheets that are embedded within these  
17 documents that represent these data dictionaries. And this  
18 is a sample right now that we have of what these data  
19 dictionaries look like, and it's basically the Word version  
20 of the schema of the database, it's being put in a Word  
21 format.

22 THE COURT: I guess I don't understand that, but  
23 let's put that on the back burner for now.

24 What else would you like to add about what the  
25 agency has done here?

1 MS. MOLEN: Well, I mean, so as far as conducting  
2 a search of the database now, we don't think that's  
3 necessary because we have the records for when the search  
4 was conducted in 2014, and these are the dictionaries that  
5 were collected at that time.

6 As far as the testimony, I actually spoke to  
7 Mr. Smith. Before any of this was produced, I told him, you  
8 know, read the opinion, this is what the Court is thinking,  
9 this is how the Court wants to see these documents produced  
10 to plaintiff. And I was working hand in hand with him when  
11 he reviewed these documents, they were reviewed by ICE, and  
12 this is what they came up with.

13 THE COURT: Well, Mr. Smith, who testified, was  
14 involved in the redaction process?

15 MS. MOLEN: I spoke to Mr. Smith, I told him what  
16 you were looking for. He has copies of the transcript.  
17 We -- I mean, this is not --

18 THE COURT: So my question, Ms. Molen, is: Did  
19 Mr. Smith, who testified at the hearing, participate in the  
20 redaction process?

21 MS. MOLEN: I don't know -- I don't think he  
22 actually redacted the record.

23 THE COURT: Yeah, this is the problem, all right?

24 I've got to tell you, I don't want to take this  
25 out on you, Ms. Molen, but you're the one representing the



1 agency: It's as if nobody heard a word I had to say last  
2 time we were here. I am literally at a loss right now.  
3 I am at a loss. I have never, in my judicial career, had an  
4 agency respond to a judicial order in the way that ICE has  
5 responded to this order in this case.

6           The agency had a full and fair opportunity to  
7 litigate this thing to the maximum extent available in a  
8 FOIA litigation. You submitted declarations. I didn't  
9 think the declarations were sufficient. I gave you the  
10 opportunity to put somebody on the witness stand. You did.  
11 I gave you the opportunity to put somebody on the witness  
12 stand under seal and you did. And then I issued a very  
13 lengthy written decision, which you have not appealed, okay?  
14 You haven't appealed it yet; you have not filed a notice of  
15 appeal.

16           And now you are giving me data dictionaries that  
17 are essentially redacted in full. And you're giving me  
18 something from Ms. De Castro that is entirely conclusory  
19 that just says, well, I talked to a bunch of people and we  
20 think this is the stuff that's really law-enforcement  
21 sensitive, and we're going to invoke Exemption (b) (7) (E),  
22 yet again, and literally -- and basically withhold everything  
23 from this data dictionary.

24           So, Ms. Molen, do you think what the agency has  
25 produced is consistent with the opinion? Is it consistent

1 with all that's happened in these proceedings and what  
2 Mr. -- I can't remember what his last name is -- what he  
3 testified to at the hearing? Can you make that  
4 representation in good faith?

5 MS. MOLEN: But I was not at the hearing.

6 No, I can't.

7 THE COURT: No, but I take it you read the  
8 transcript?

9 MS. MOLEN: Yes, but...

10 THE COURT: Is this consistent with what the  
11 testimony was and the findings that I made?

12 MS. MOLEN: Your Honor, I --

13 THE COURT: You can say the answer is "no" because  
14 that's clearly the answer. It's okay, I'm not blaming you,  
15 but the answer is clearly "no." It's clearly "no."

16 You cannot tell me, you cannot tell me that every  
17 single one of these lines, every single one of these table  
18 names needs to be redacted, consistent with the testimony  
19 that came out at that hearing. It just cannot be possible.  
20 This is a 95 percent redacted document, and what you've  
21 given them is essentially nothing.

22 You know, I think the only thing that I can do  
23 here now at this point is I want supervisors and higher-ups  
24 on the next conference; otherwise, somebody is getting  
25 sanctioned.

1           I'm done, I'm really done. I've never lost my  
2 patience with parties ever before, let alone in a FOIA  
3 litigation. The agency wants to re-litigate this case.  
4 Why are you submitting declarations to me at this point?  
5 We had a hearing.

6           MS. MOLEN: Your Honor, I mean, our understanding  
7 is that you wanted a segregability analysis of what needed  
8 to be released.

9           THE COURT: I did, but -- you're right, Ms. Molen,  
10 I did, but one that was consistent with the findings I made  
11 and the testimony.

12           This is nonsense, all right? You've returned to  
13 me a document that is 95 percent redacted. That is not at  
14 all consistent with the history of this case, the testimony,  
15 and my findings.

16           This agency produced these very records to this  
17 plaintiff for years, and then you all put on somebody on the  
18 witness stand, who was cross-examined by Mr. Nelson, who  
19 said, yeah, you know, a fair amount of this actually isn't  
20 problematic, and the only thing that really concerns me are  
21 the things that might create linkages between these  
22 databases -- or between these tables.

23           And you have now redacted everything, every single  
24 table name, every single attribute of that table name, every  
25 field name, which is entirely inconsistent. And it is not

1 my job as a Federal Judge to get these documents and figure  
2 this out. It's yours and your agency's.

3 So here's what I'm going to do. Ms. Molen, you  
4 are going to make sure that the next hearing we have, which  
5 is going to be in a week, has somebody at the  
6 U.S. Attorney's Office who's a supervisor and somebody who's  
7 a higher-up at ICE, who can respond to what is happening in  
8 this case.

9 I'm not doing this anymore, because otherwise you  
10 all are going to get sanctioned. And I don't know how one  
11 really sanctions a federal agency. It's not like you can  
12 sanction them in a way that you sanction a party, like money  
13 is really going to matter to a federal agency. But you're  
14 going to get sanctioned unless something starts happening in  
15 this matter that is consistent with what has happened in  
16 this case.

17 I don't understand this. You are thumbing your  
18 nose at what has happened in this case. This case was filed  
19 in 2014 and you want to re-litigate it in 2021. You can't  
20 do that. If you think I'm wrong, file your Notice of  
21 Appeal, although it's probably too late. I don't know  
22 whether it is or not. File your Notice of Appeal and go up  
23 to the D.C. Circuit. Stop wasting everybody's time.

24 MS. MOLEN: I mean, we understood from your  
25 opinion that you wanted something from us and it was the

1 segregability analysis, and that's what we've been trying --

2 THE COURT: No, Ms. Molen.

3 What I wanted was a segregability analysis that  
4 was consistent with the findings I made about what kind of  
5 disclosures would or would not create a risk of law  
6 enforcement compromise. That's what I asked you to do.  
7 I didn't ask you to just go through and start redacting  
8 things and say, ha, here you go, here's a segregability  
9 analysis. That's not what I asked you to do. I wrote  
10 35 pages telling you what to do and you haven't done it, you  
11 haven't done it.

12 I don't act this way with parties, I really don't,  
13 I try not to do this, but you all have really tried my  
14 patience. I don't know what more to do and I don't know  
15 what more to say other than escalating this to people who  
16 will actually understand that when a court actually rules on  
17 something, that that order should be followed. This is just  
18 unbelievable. It's unbelievable.

19 Are you all available next Wednesday at 3:00 p.m.?

20 MS. MOLEN: Yes, Your Honor.

21 MR. NELSON: Yes, Your Honor. Sorry, I was trying  
22 to find the unmute button. Yes.

23 THE COURT: Okay.

24 Ms. Molen, you know, whether it's the head of the  
25 Civil Division, who I think is probably the appropriate

1 person to have on this call on this next hearing, and  
2 whoever it is at the agency in the general counsel's office  
3 that can actually respond to meaningful questions from the  
4 Court, need to be on this next call, this next hearing,  
5 okay?

6 MS. MOLEN: Okay.

7 THE COURT: Thank you, all.

8 MR. NELSON: Thank you, Your Honor.

9 (Proceedings concluded at 10:56 a.m.)

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C E R T I F I C A T E

I, William P. Zaremba, RMR, CRR, certify that the foregoing is a correct transcript from the record of proceedings in the above-titled matter.

Please note: This hearing occurred during the COVID-19 pandemic and is therefore subject to the technological limitations of court reporting remotely.

Date: July 29, 2021 /S/ William P. Zaremba

William P. Zaremba, RMR, CRR

**COURTROOM**  
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**THE COURT:** [16]

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11/9 12/13

**you've [2]** 10/20 11/12

**your [15]** 3/2 3/21 3/22  
3/24 6/12 10/12 11/6  
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**Your Honor [7]** 3/2  
6/12 10/12 11/6 13/20  
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**Z**

**Zaremba [4]** 2/2 15/2  
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