

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:20-cv-03787-TSC**

LOUISE TRAUMA CENTER, LLC v. UNITED STATES  
IMMIGRATION AND CUSTOMS ENFORCMENT et al  
Assigned to: Judge Tanya S. Chutkan  
Cause: 05:552 Freedom of Information Act

Date Filed: 12/22/2020  
Jury Demand: None  
Nature of Suit: 895 Freedom of  
Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff****LOUISE TRAUMA CENTER, LLC**

represented by **David Laundon Cleveland , Sr.**  
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**ATTORNEY TO BE NOTICED**

V.

**Defendant****UNITED STATES IMMIGRATION  
AND CUSTOMS ENFORCMENT**

represented by **Darrell C. Valdez**  
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**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

**Defendant****DEPARTMENT OF HOMELAND  
SECURITY**

represented by **Darrell C. Valdez**  
(See above for address)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
12/22/2020	<u>1</u>	COMPLAINT against All Defendants ( Filing fee \$ 402 receipt number ADCDC-7989578) filed by ella Louise Trauma Center LLC. (Attachments: # <u>1</u> Exhibit, # <u>2</u> Exhibit, # <u>3</u> Exhibit, # <u>4</u> Exhibit, # <u>5</u> Exhibit, # <u>6</u> Exhibit)(Cleveland, David) (Entered: 12/22/2020)
12/22/2020	<u>2</u>	CIVIL COVER SHEET by ella Louise Trauma Center LLC re <u>1</u> Complaint, filed by ella Louise Trauma Center LLC. Related document: <u>1</u> Complaint, filed by ella Louise Trauma Center LLC. (Attachments: # <u>1</u> Summons, # <u>2</u> Summons, # <u>3</u> Summons, # <u>4</u> Summons)(Cleveland, David) (Entered: 12/22/2020)
12/22/2020		Case Assigned to Judge Tanya S. Chutkan. (adh, ) (Entered: 12/22/2020)
12/22/2020	<u>3</u>	SUMMONS (4) Issued Electronically as to UNITED STATES DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT, U.S. Attorney and U.S. Attorney General (Attachment: # <u>1</u> Notice and Consent)(adh, ) (Entered: 12/22/2020)

12/23/2020	<u>4</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 12/23/2020. Answer due for ALL FEDERAL DEFENDANTS by 1/22/2021. (Cleveland, David) (Entered: 12/23/2020)
12/30/2020	<u>5</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 12/28/20. (Attachments: # <u>1</u> Exhibit)(Cleveland, David) (Entered: 12/30/2020)
12/30/2020	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT served on 12/28/2020 (Attachments: # <u>1</u> Exhibit)(Cleveland, David) (Entered: 12/30/2020)
12/30/2020	<u>7</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. UNITED STATES DEPARTMENT OF HOMELAND SECURITY served on 12/28/2020 (Attachments: # <u>1</u> Exhibit)(Cleveland, David) (Entered: 12/30/2020)
01/22/2021	<u>8</u>	ENTERED IN ERROR. . . .NOTICE of Appearance by Darrell C. Valdez on behalf of UNITED STATES DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT (Valdez, Darrell) Modified on 1/22/2021 (ztd). (Entered: 01/22/2021)
01/22/2021	<u>9</u>	ANSWER to Complaint by UNITED STATES DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT.(Valdez, Darrell) (Entered: 01/22/2021)
01/22/2021		NOTICE OF ERROR re <u>8</u> Notice of Appearance; emailed to darrell.valdez@usdoj.gov, cc'd 1 associated attorneys -- The PDF file you docketed contained errors: 1. Incorrect header/caption/case number, 2. Please refile document (ztd, ) (Entered: 01/22/2021)
01/22/2021	<u>10</u>	NOTICE of Appearance by Darrell C. Valdez on behalf of UNITED STATES DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT (Valdez, Darrell) (Entered: 01/22/2021)
01/27/2021		MINUTE ORDER: Before the Court in this FOIA case are a complaint and an answer. The requirements of LCvR 16.3 and Rule 26(f) of the Federal Rules of Civil procedure appear to be inapplicable. IT IS HEREBY ORDERED that the parties shall meet and confer and propose a schedule for proceeding in this matter. The schedule shall address the status of Plaintiff's FOIA request, the anticipated number of documents responsive to Plaintiff's FOIA request, the anticipated date(s) for release of the documents requested by Plaintiff, whether a motion for an Open America stay is likely in this case, whether a Vaughn index will be required in this case, whether and when either party anticipates filing a dispositive motion, and any other pertinent issues. The parties shall file a joint status report that addresses these issues no later than 3/5/2021. The joint status report shall be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 1/27/21. (DJS) (Entered: 01/27/2021)
01/28/2021		Set/Reset Deadlines: Joint Status Report due by 3/5/2021. (tb) (Entered: 01/28/2021)
03/05/2021	<u>11</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Attachments: # <u>1</u> Text of Proposed Order)(Valdez, Darrell) (Entered: 03/05/2021)
03/08/2021		MINUTE ORDER: Having considered the parties' joint status report, it is hereby ordered that the parties shall file another joint report by 5/5/21, along with a proposed order. Signed by Judge Tanya S. Chutkan on 3/8/21. (DJS) (Entered: 03/08/2021)
03/08/2021		Set/Reset Deadlines: Joint Status Report due by 5/5/2021. (tb) (Entered: 03/08/2021)
05/05/2021	<u>12</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Attachments: # <u>1</u> Text of Proposed Order)(Valdez, Darrell) (Entered: 05/05/2021)
05/10/2021		MINUTE ORDER: Having considered the parties' joint status report <u>12</u> , it is hereby ordered that the parties shall file another joint report by 5/7/21 and every 30 days thereafter. To the extent the report contains a proposed production or briefing schedule, the report shall be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 5/10/21. (DJS) (Entered: 05/10/2021)

05/11/2021		Set/Reset Deadlines: Joint Status Report due by 5/7/2021. (tb) (Entered: 05/11/2021)
05/11/2021		AMENDED MINUTE ORDER: The court's 5/10/21 Minute Order is hereby amended to reflect that the parties' joint status report is due 6/7/21 and every 30 days thereafter. To the extent the report contains a proposed production or briefing schedule, the report shall be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 5/11/21. (DJS) Modified event title on 5/13/2021 (znmw). (Entered: 05/11/2021)
05/12/2021		Set/Reset Deadlines: Joint Status Report due by 6/7/2021. (tb) (Entered: 05/12/2021)
06/07/2021	<u>13</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Valdez, Darrell) (Entered: 06/07/2021)
06/12/2021	<u>14</u>	MOTION for Summary Judgment by LOUISE TRAUMA CENTER, LLC. (Attachments: # <u>1</u> Statement of Facts, # <u>2</u> Declaration)(Cleveland, David) (Entered: 06/12/2021)
07/02/2021		MINUTE ORDER: On 5/11/21 after having considered the parties' joint status report in which the parties indicated no areas of disagreement in this FOIA action, the court ordered the parties to file another joint report by 6/7/21 and every 30 days thereafter. See 5/11/21 Min. Order. To the extent the reported contained a proposed production or briefing schedule, the parties were ordered to attach a proposed order to the report. See id. The parties filed another joint report on 6/7/21 in which they discussed Defendants' progress processing Plaintiff's FOIA request, as well as planned release dates for non-exempt records and indicated they would file another joint report in approximately one month. Plaintiff raised no concerns or objections in the joint report, nor did Plaintiff propose a briefing schedule. However, on 6/12/21 without leave of court, Plaintiff filed a motion for summary judgment in which it argued that no records had been produced (even though the agreed upon date had not passed) and argued that Defendants had suggested "no deadlines for itself." See ECF No. 14. Plaintiff's motion for summary judgment is hereby DENIED without prejudice. To the extent Plaintiff has objections to the processing or release of documents, it shall meet and confer with Defendants before the parties' file their status reports. Any objections or concerns shall be so noted in the joint report and any proposed briefing schedule (whether jointly or unilaterally proposed) shall be so noted. A proposed order shall accompany the report if one or both parties propose a production or briefing schedule. Signed by Judge Tanya S. Chutkan on 7/2/21. (DJS) (Entered: 07/02/2021)
07/09/2021	<u>15</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Valdez, Darrell) (Entered: 07/09/2021)
07/21/2021		MINUTE ORDER: Having considered the parties' joint status report <u>15</u> , it is hereby ordered that the parties meet, confer and file another joint report by 7/30/21 and every 30 days thereafter. Any areas of disagreement shall be noted in the report. To the extent one or both parties propose a change in the status quo, the report shall be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 7/21/21. (DJS) (Entered: 07/21/2021)
07/22/2021		Set/Reset Deadlines: Joint Report due by 7/30/2021. (tb) (Entered: 07/22/2021)
07/30/2021	<u>16</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Valdez, Darrell) (Entered: 07/30/2021)
08/30/2021	<u>17</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Valdez, Darrell) (Entered: 08/30/2021)
09/29/2021	<u>18</u>	Joint STATUS REPORT by UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Valdez, Darrell) (Entered: 09/29/2021)
10/28/2021	<u>19</u>	Joint STATUS REPORT by UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Valdez, Darrell) (Entered: 10/28/2021)
11/26/2021	<u>20</u>	Joint STATUS REPORT by DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Valdez,

		Darrell) (Entered: 11/26/2021)
12/24/2021	<u>21</u>	Joint STATUS REPORT by UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Attachments: # <u>1</u> Text of Proposed Order)(Valdez, Darrell) (Entered: 12/24/2021)
12/28/2021		MINUTE ORDER: Having considered the parties' joint status report it is hereby ordered that the parties shall adhere to the following briefing schedule: Defendants' Motion for Summary Judgment is due by 2/28/2022. Plaintiffs Combined Opposition/Cross– Motion is due by 3/21/2022. Defendants' Combined Opposition/Reply is due by 4/4/2022. Plaintiffs' Reply is due by 4/18/2022. Signed by Judge Tanya S. Chutkan on 12/28/21. (DJS) (Entered: 12/28/2021)
12/28/2021		Set/Reset Deadlines: Cross Motion due by 3/21/2022. Response to Cross Motion due by 4/4/2022. Reply to Cross Motion due by 4/18/2022. Summary Judgment motion due by 2/8/2022. Response to Motion for Summary Judgment due by 3/21/2022. Reply to Motion for Summary Judgment due by 4/4/2022. (tb) (Entered: 12/28/2021)
02/23/2022	<u>22</u>	Consent MOTION to Stay re Scheduling Order, Set/Reset Deadlines, by DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Attachments: # <u>1</u> Text of Proposed Order)(Valdez, Darrell) (Entered: 02/23/2022)
02/23/2022		MINUTE ORDER: Granting Consent <u>22</u> Motion to Stay Briefing schedule. Briefing in this action is hereby stayed pending further order of the court. The parties shall file a Joint Status Report by April 27, 2022, and every 30 days thereafter informing the Court of the outcome of the re–processing and any further production of documents responsive to Plaintiff's Freedom of Information Act request. To the extent the parties request a change of the status quo or a briefing schedule, the report shall be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 2/23/22. (DJS) (Entered: 02/23/2022)
02/28/2022		Set/Reset Deadlines: Joint Status Report due by 4/27/2022. (tb) (Entered: 02/28/2022)
04/27/2022	<u>23</u>	Joint STATUS REPORT by UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Valdez, Darrell) (Entered: 04/27/2022)
05/27/2022	<u>24</u>	Joint STATUS REPORT by UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Attachments: # <u>1</u> Text of Proposed Order Plaintiff's Proposed Order, # <u>2</u> Text of Proposed Order Defendant's Proposed Order)(Valdez, Darrell) (Entered: 05/27/2022)
07/07/2022	<u>25</u>	Consent MOTION to Modify <i>Proposed Dispositive Motions Schedule</i> by DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Attachments: # <u>1</u> Text of Proposed Order)(Valdez, Darrell) (Entered: 07/07/2022)
07/07/2022		MINUTE ORDER granting Consent <u>25</u> Motion to Modify Deadlines. Defendants' Motion for Summary Judgment is due by August 8, 2022. Plaintiffs' Combined Opposition/Cross–Motion is due by September 8, 2022. Defendants' Combined Opposition/Reply is due by September 22, 2022. Plaintiffs' Reply is due by October 6, 2022. Signed by Judge Tanya S. Chutkan on 7/7/22. (DJS) (Entered: 07/07/2022)
07/12/2022		Set/Reset Deadlines: Cross Motion due by 9/8/2022. Response to Cross Motion due by 9/22/2022. Reply to Cross Motion due by 10/6/2022. Summary Judgment motion due by 8/8/2022. Response to Motion for Summary Judgment due by 9/8/2022. Reply to Motion for Summary Judgment due by 9/22/2022. (tb) (Entered: 07/12/2022)
08/08/2022	<u>26</u>	MOTION for Summary Judgment by DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Attachments: # <u>1</u> Statement of Facts, # <u>2</u> Declaration Schurkamp Decl., # <u>3</u> Exhibit A – Vaughn Index, # <u>4</u> Exhibit B, # <u>5</u> Exhibit C, # <u>6</u> Exhibit D, # <u>7</u> Exhibit E, # <u>8</u> Exhibit E–1, # <u>9</u> Exhibit F, # <u>10</u> Exhibit G, # <u>11</u> Exhibit G–1, # <u>12</u> Exhibit H, # <u>13</u> Exhibit I, # <u>14</u> Exhibit I–1, # <u>15</u> Exhibit J, # <u>16</u> Text of Proposed Order)(Valdez, Darrell) (Entered: 08/08/2022)
08/08/2022	<u>27</u>	ERRATA by DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT re <u>26</u> Motion for Summary

		Judgment, filed by UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT, DEPARTMENT OF HOMELAND SECURITY. (Attachments: # <u>1</u> Declaration Shurkamp Decl. – Corrected Copy)(Valdez, Darrell) (Entered: 08/08/2022)
09/07/2022	<u>28</u>	RESPONSE re <u>26</u> MOTION for Summary Judgment filed by LOUISE TRAUMA CENTER, LLC. (Attachments: # <u>1</u> Statement of Facts)(Cleveland, David) (Entered: 09/07/2022)
09/07/2022	<u>29</u>	Cross MOTION for Summary Judgment by LOUISE TRAUMA CENTER, LLC. (Attachments: # <u>1</u> Statement of Facts)(Cleveland, David) (Entered: 09/07/2022)
09/19/2022	<u>30</u>	Consent MOTION for Extension of Time to File Response/Reply as to <u>29</u> Cross MOTION for Summary Judgment , <u>26</u> MOTION for Summary Judgment by DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Attachments: # <u>1</u> Text of Proposed Order)(Valdez, Darrell) (Entered: 09/19/2022)
09/19/2022		MINUTE ORDER: Defendants' <u>30</u> <i>Consent Motion for Extension of Time to File Response/Reply</i> is <b>GRANTED</b> . Defendants' Opposition to Plaintiff's Cross-Motion and Reply is due by <b>October 7, 2022</b> . Plaintiff's Reply in support of its Cross-Motion is due by <b>October 21, 2022</b> . Signed by Judge Tanya S. Chutkan on 09/19/2022. (lcss) (Entered: 09/19/2022)
09/19/2022		Set/Reset Deadlines: Cross Motion due by 10/7/2022. Response to Motion for Summary Judgment due by 10/7/2022. Reply to Motion for Summary Judgment due by 10/21/2022. (tb) (Entered: 09/19/2022)
10/07/2022	<u>31</u>	Consent MOTION to Modify <i>Dispositive Motions Schedule</i> by DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Attachments: # <u>1</u> Text of Proposed Order)(Valdez, Darrell) (Entered: 10/07/2022)
10/07/2022		MINUTE ORDER: The <u>31</u> <i>Consent Motion to Modify Dispositive Motions Schedule</i> is GRANTED. Defendants' Opposition to Plaintiff's Cross-Motion and Reply is due by <b>October 17, 2022</b> . Plaintiff's Reply in support of its Cross-Motion is due by <b>October 31, 2022</b> . Signed by Judge Tanya S. Chutkan on 10/7/2022. (lcss) (Entered: 10/07/2022)
10/07/2022		Set/Reset Deadlines: Defendants' Reply in Support of its Motion for Summary Judgment and Opposition to Plaintiff's Cross-Motion is due by 10/17/2022. Plaintiff's Reply in support of its Cross-Motion is due by 10/31/2022. (jth) (Entered: 10/09/2022)
10/17/2022	<u>32</u>	Memorandum in opposition to re <u>29</u> Motion for Summary Judgment filed by DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Attachments: # <u>1</u> Statement of Facts, # <u>2</u> Declaration Schurkamp Supp., # <u>3</u> Text of Proposed Order)(Valdez, Darrell) (Entered: 10/17/2022)
10/17/2022	<u>33</u>	REPLY to opposition to motion re <u>26</u> MOTION for Summary Judgment filed by DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT. (Attachments: # <u>1</u> Declaration)(Valdez, Darrell) (Entered: 10/17/2022)
10/21/2022	<u>34</u>	ERRATA <i>Corrected Supplemental Declaration</i> by DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT re <u>33</u> Reply to opposition to Motion. (Attachments: # <u>1</u> Declaration Corrected Supp. Decl.)(Valdez, Darrell) (Entered: 10/21/2022)
10/21/2022	<u>35</u>	ERRATA <i>Corrected Supplemental Declaration</i> by DEPARTMENT OF HOMELAND SECURITY, UNITED STATES IMMIGRATION AND CUSTOMS ENFORCMENT re <u>32</u> Memorandum in Opposition,. (Attachments: # <u>1</u> Declaration Corrected Supplemental Declaration)(Valdez, Darrell) (Entered: 10/21/2022)
10/28/2022	<u>36</u>	REPLY to opposition to motion re <u>29</u> Cross MOTION for Summary Judgment filed by LOUISE TRAUMA CENTER, LLC. (Cleveland, David) (Entered: 10/28/2022)