

**U.S. District Court  
 District of Maryland (Greenbelt)  
 CIVIL DOCKET FOR CASE #: 8:22-cv-00153-TDC**

The James Madison Project et al v. Department of Defense  
 Assigned to: Judge Theodore D. Chuang  
 Cause: 05:552 Freedom of Information Act

Date Filed: 01/20/2022  
 Date Terminated: 06/26/2023  
 Jury Demand: None  
 Nature of Suit: 895 Freedom of Information Act  
 Jurisdiction: U.S. Government Defendant

**Plaintiff**

**The James Madison Project**

represented by **Mark Steven Zaid**  
 Mark S Zaid PC  
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 Ste 700  
 Washington, DC 20036  
 2024542809  
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*LEAD ATTORNEY*

**Bradley P Moss**  
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 12029077945  
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*ATTORNEY TO BE NOTICED*

**Plaintiff**

**Brian J. Karem**

represented by **Mark Steven Zaid**  
 (See above for address)  
*LEAD ATTORNEY*

**Bradley P Moss**  
 (See above for address)  
*ATTORNEY TO BE NOTICED*

V.

**Defendant**

**Department of Defense**

represented by **Lisa Newman**  
 Federal Programs Branch Department Of Justice  
 1100 L St. NW  
 Washington, DC 20005  
 2023535882  
 Fax: 2026168470  
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*ATTORNEY TO BE NOTICED*

Date Filed	#	Docket Text
01/20/2022	<u>1</u>	COMPLAINT against Department of Defense ( Filing fee \$ 402 receipt number 0416-9708088.), filed by THE JAMES MADISON PROJECT, BRIAN J KAREM. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Exhibit Corporate Disclosure Sheet, # <u>3</u>

		Summons DoD, # <u>4</u> Summons USAG, # <u>5</u> Summons USAMD)(Moss, Bradley) (Entered: 01/20/2022)
01/20/2022	<u>2</u>	Summons Issued 60 days as to Department of Defense, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Summons, # <u>2</u> Summons)(dg3s, Deputy Clerk) (Entered: 01/20/2022)
01/20/2022	<u>3</u>	NOTICE of Case Assignment. This case has been assigned to Magistrate Judge Gina L. Simms. Brian J. Karem, The James Madison Project or counsel for Brian J. Karem, The James Madison Project are required to review and comply with the Magistrate Judge Pilot Project Procedures which can be downloaded <a href="#">here</a> . Pursuant to Standing Order 2019-07, which can be downloaded <a href="#">here</a> , counsel has 14 days from the date of this notice to file their consent, or decline to consent to proceed before a U.S. Magistrate Judge which can be downloaded <a href="#">here</a> . To file your consent, go to <i>Civil &gt; Other Filings &gt; Other Documents &gt; 25 Pct Mag – Consent to Proceed Before a Magistrate Judge</i> . To file your declination, go to <i>Civil &gt; Other Filings &gt; Other Documents &gt; 25 Pct Mag – Decline to Proceed Before a Magistrate Judge</i> . Failure to file a consent or declination will result in issuance of an Order to Show Cause. Please review the case management order that has been issued in this case. Magistrate Election Form due by 2/3/2022. (dg3s, Deputy Clerk) (Entered: 01/20/2022)
01/20/2022	<u>4</u>	Case Management Order. Signed by Magistrate Judge Gina L Simms on 1/20/2022. (dg3s, Deputy Clerk) (Entered: 01/20/2022)
01/21/2022		Case Reassigned to Judge Paul W. Grimm. Magistrate Judge Gina L Simms no longer assigned to the case. (jf3s, Deputy Clerk) (Entered: 01/21/2022)
01/21/2022	<u>6</u>	LETTER ORDER Regarding the Filing of Motions. Signed by Judge Paul W. Grimm on 1/21/2022. (dg3s, Deputy Clerk) (Entered: 01/24/2022)
01/28/2022	<u>7</u>	SUMMONS Returned Executed by The James Madison Project, Brian J. Karem. Department of Defense served on 1/27/2022, answer due 3/28/2022. (Attachments: # <u>1</u> Receipt USADM)(Moss, Bradley) (Entered: 01/28/2022)
02/16/2022	<u>8</u>	Correspondence re: Filing Amended Complaint as a Matter of Course (Moss, Bradley) (Entered: 02/16/2022)
02/17/2022	<u>9</u>	PAPERLESS ORDER regarding <u>8</u> Correspondence advising the Court that Plaintiff intends to file an amended complaint. Under the circumstances, Plaintiff does not need the Court's leave nor Defendant's consent to amend the complaint. See Fed. R. Civ. P. 15(a). Plaintiff is reminded to include a redline version pursuant to Local Rule 103.6(c) (D. Md. 2021). Signed by Judge Paul W. Grimm on 2/17/2022. (imws, Chambers) (Entered: 02/17/2022)
02/17/2022	<u>10</u>	AMENDED COMPLAINT against Department of Defense, filed by The James Madison Project, Brian J. Karem. (Attachments: # <u>1</u> Exhibit Redlined Amended Complaint)(Moss, Bradley) (Entered: 02/17/2022)
03/09/2022	<u>11</u>	ANSWER to <u>10</u> Amended Complaint by Department of Defense.(Newman, Lisa) (Entered: 03/09/2022)
03/10/2022	<u>12</u>	NOTICE of Appearance by Mark Steven Zaid on behalf of All Plaintiffs (Zaid, Mark) (Entered: 03/10/2022)
03/15/2022	<u>13</u>	SCHEDULING ORDER: Status Report due by 8/22/2022. Signed by Judge Paul W. Grimm on 3/15/2022. (heps, Deputy Clerk) (Entered: 03/15/2022)
03/15/2022	<u>14</u>	DISCOVERY ORDER. Signed by Judge Paul W. Grimm on 3/15/2022. (Attachments: # <u>1</u> Initial Discovery Protocols)(heps, Deputy Clerk) (Entered: 03/15/2022)
03/15/2022	<u>15</u>	LETTER ORDER Scheduling a Telephone Conference Call on March 30, 2022 at 2:15 p.m. Signed by Judge Paul W. Grimm on 3/15/2022. (heps, Deputy Clerk) (Entered: 03/15/2022)
03/23/2022	<u>16</u>	Correspondence re: Disclosure of Damages and Relief Sought (Moss, Bradley) (Entered: 03/23/2022)
03/29/2022	<u>17</u>	NOTICE of Appearance by Mark Steven Zaid on behalf of All Plaintiffs (Zaid, Mark) (Entered: 03/29/2022)

03/30/2022	<u>18</u>	STATUS REPORT <i>for Joint Scheduling Order</i> by Department of Defense(Newman, Lisa) (Entered: 03/30/2022)
03/31/2022	<u>19</u>	MARGINAL ORDER granting <u>18</u> STATUS REPORT for Joint Scheduling Order. Signed by Judge Paul W. Grimm on 3/30/2022. (dg3s, Deputy Clerk) (Entered: 03/31/2022)
03/31/2022	<u>20</u>	NOTICE of Appearance by Mark Steven Zaid on behalf of All Plaintiffs (Zaid, Mark) (Entered: 03/31/2022)
06/10/2022	<u>21</u>	MOTION for Summary Judgment by Department of Defense. (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Declaration of Linda Kiyosaki)(Newman, Lisa) (Entered: 06/10/2022)
07/11/2022	<u>22</u>	RESPONSE in Opposition re <u>21</u> MOTION for Summary Judgment filed by Brian J. Karem, The James Madison Project. (Attachments: # <u>1</u> Exhibit 1 – Declaration of Mark S. Zaid, # <u>2</u> Text of Proposed Order)(Moss, Bradley) (Entered: 07/11/2022)
07/11/2022	<u>23</u>	NOTICE of Appearance by Mark Steven Zaid on behalf of All Plaintiffs (Zaid, Mark) (Entered: 07/11/2022)
08/01/2022	<u>24</u>	Consent MOTION for Extension of Time to File Response/Reply by Department of Defense. (Attachments: # <u>1</u> Text of Proposed Order)(Newman, Lisa) (Entered: 08/01/2022)
08/01/2022	<u>25</u>	ORDER granting <u>24</u> Consent MOTION for Extension of Time to File Response/Reply. Signed by Judge Paul W. Grimm on 8/1/2022. (dg3s, Deputy Clerk) (Entered: 08/01/2022)
09/09/2022	<u>26</u>	REPLY to Response to Motion re <u>21</u> MOTION for Summary Judgment filed by Department of Defense. (Attachments: # <u>1</u> Supplemental Declaration of Linda M. Kiyosaki)(Newman, Lisa) (Entered: 09/09/2022)
12/27/2022		Case Reassigned to Judge Theodore D. Chuang. Judge Paul W. Grimm no longer assigned to the case. (kns, Deputy Clerk) (Entered: 12/27/2022)
01/03/2023	<u>27</u>	CASE MANAGEMENT ORDER. Signed by Judge Theodore D. Chuang on 1/3/2023. (ols, Deputy Clerk) (Entered: 01/04/2023)
03/31/2023	<u>28</u>	ORDER directing that NSA shall prepare an ex parte supplemental classified affidavit in support of it's Motion for Summary Judgment within 21 days and STAYING CASE pending completion of this process. Signed by Judge Theodore D. Chuang on 3/31/2023. (kns, Deputy Clerk) (Entered: 03/31/2023)
04/07/2023	<u>29</u>	Consent MOTION for Extension of Time to File Response/Reply <i>to Lodge Classified Declaration</i> by Department of Defense. (Attachments: # <u>1</u> Proposed Order)(Newman, Lisa) (Entered: 04/07/2023)
04/17/2023	<u>30</u>	ORDER granting <u>29</u> Defendant's Consent Motion for Extension of Time to Lodge Classified Declaration. Signed by Judge Theodore D. Chuang on 4/17/2023. (ols, Deputy Clerk) (Entered: 04/17/2023)
05/04/2023	<u>31</u>	Consent MOTION for Extension of Time to File Response/Reply <i>to file ex parte declaration</i> by Department of Defense. (Attachments: # <u>1</u> Proposed Order)(Newman, Lisa) (Entered: 05/04/2023)
05/05/2023	<u>32</u>	ORDER granting <u>31</u> Department of Defense's Consent Motion for Extension of Time to Lodge Classified Declaration. Signed by Judge Theodore D. Chuang on 5/5/2023. (ols, Deputy Clerk) (Entered: 05/05/2023)
06/26/2023	<u>34</u>	MEMORANDUM OPINION. Signed by Judge Theodore D. Chuang on 6/26/2023. (ols, Deputy Clerk) (Entered: 06/26/2023)
06/26/2023	<u>35</u>	ORDER granting <u>21</u> Defendant National Security Agency's Motion for Summary Judgment. Signed by Judge Theodore D. Chuang on 6/26/2023. (ols, Deputy Clerk) (Entered: 06/26/2023)