

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:22-cv-00358-CKK**

CHAM BANK S.A. v. U.S. DEPARTMENT OF THE
TREASURY
Assigned to: Judge Colleen Kollar-Kotelly
Cause: 05:552 Freedom of Information Act

Date Filed: 02/09/2022
Jury Demand: None
Nature of Suit: 895 Freedom of
Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff**CHAM BANK S.A.**

represented by **Amy Brown Doolittle**
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V.

Defendant**U.S. DEPARTMENT OF THE
TREASURY**

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Date Filed	#	Docket Text
02/09/2022	<u>1</u>	COMPLAINT against U.S. DEPARTMENT OF THE TREASURY (Filing fee \$ 402 receipt number ADCDC-9034641) filed by CHAM BANK S.A.. (Attachments: # <u>1</u> Exhibit 1 - Dec. 20, 2017 FOIA Request, # <u>2</u> Exhibit 2 - Jan. 9, 2018 FOIA Request, # <u>3</u> Civil Cover Sheet, # <u>4</u> Summons U.S. Department of Treasury, # <u>5</u> Summons U.S. Attorney General, # <u>6</u> Summons U.S. Attorney's Office for the District of Columbia)(Baloul, Gassan) (Entered: 02/09/2022)

02/09/2022	<u>2</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by CHAM BANK S.A. (Baloul, Gassan) (Entered: 02/09/2022)
02/09/2022	<u>3</u>	NOTICE of Appearance by Mitchell R. Berger on behalf of CHAM BANK S.A. (Berger, Mitchell) (Entered: 02/09/2022)
02/09/2022	<u>4</u>	NOTICE of Appearance by Amy Brown Doolittle on behalf of CHAM BANK S.A. (Doolittle, Amy) (Entered: 02/09/2022)
02/10/2022		Case Assigned to Judge Colleen Kollar-Kotelly. (zsb) (Entered: 02/10/2022)
02/11/2022	<u>5</u>	ORDER ESTABLISHING PROCEDURES FOR CASES ASSIGNED TO JUDGE COLLEEN KOLLAR-KOTELLY. Signed by Judge Colleen Kollar-Kotelly on 2/11/22. (DM) (Entered: 02/11/2022)
02/14/2022	<u>6</u>	SUMMONS (3) Issued Electronically as to U.S. DEPARTMENT OF THE TREASURY, U.S. Attorney and U.S. Attorney General (Attachment: # <u>1</u> Notice and Consent)(zsb) (Entered: 02/14/2022)
03/08/2022	<u>7</u>	NOTICE of Appearance by Stephen DeGenaro on behalf of U.S. DEPARTMENT OF THE TREASURY (DeGenaro, Stephen) (Entered: 03/08/2022)
03/08/2022	<u>8</u>	Consent MOTION for Extension of Time to <i>Respond to the Complaint</i> by U.S. DEPARTMENT OF THE TREASURY. (Attachments: # <u>1</u> Text of Proposed Order)(DeGenaro, Stephen) (Entered: 03/08/2022)
03/09/2022		MINUTE ORDER: The Court is in receipt of Defendants' <u>8</u> Consent Motion for an Extension of Time to Respond to the Complaint. Counsel for Defendant represents that he has a substantial docket of active cases and requires additional time to confer with agency counsel. As such, Defendant requests an extension of time, from March 24, 2022, to April 21, 2022, to respond to Plaintiff's <u>1</u> Complaint. Plaintiff consents to the motion, and this is Defendant's first such request for relief. Accordingly, and upon good cause shown, Defendant's <u>8</u> Motion is GRANTED . Defendant shall answer or otherwise respond to Plaintiff's <u>1</u> Complaint on or before April 21, 2022. Signed by Judge Colleen Kollar-Kotelly on March 9, 2022. (lcckk1) (Entered: 03/09/2022)
03/09/2022		Set/Reset Deadlines: Defendant shall answer or otherwise respond to Plaintiff's <u>1</u> Complaint on or before 4/21/2022. (dot) (Entered: 03/09/2022)
03/22/2022	<u>9</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 3/7/2022. Answer due for ALL FEDERAL DEFENDANTS by 4/6/2022. (Doolittle, Amy) (Entered: 03/22/2022)
03/22/2022	<u>10</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General Feb. 22, 2022. (Doolittle, Amy) (Entered: 03/22/2022)
03/22/2022	<u>11</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. U.S. DEPARTMENT OF THE TREASURY served on 2/22/2022 (Doolittle, Amy) (Entered: 03/22/2022)
04/21/2022	<u>12</u>	ANSWER to Complaint by U.S. DEPARTMENT OF THE TREASURY.(DeGenaro, Stephen) (Entered: 04/21/2022)
04/21/2022	<u>13</u>	ORDER. Signed by Judge Colleen Kollar-Kotelly on April 21, 2022. (lcckk1) (Entered: 04/21/2022)
04/21/2022		Set/Reset Deadlines: Joint Meet & Confer Statement due by 5/19/2022. (dot) (Entered: 04/21/2022)
05/19/2022	<u>14</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF THE TREASURY. (DeGenaro, Stephen) (Entered: 05/19/2022)
05/19/2022		MINUTE ORDER: The Court is in receipt of the parties' <u>14</u> Joint Status Report. The parties shall file another joint status report on or before August 17, 2022 and every ninety days thereafter. Signed by Judge Colleen Kollar-Kotelly on May 19, 2022. (lcckk1) (Entered: 05/19/2022)

05/19/2022		Set/Reset Deadlines: Joint Status Report due by 8/17/2022 and every ninety days thereafter. (dot) (Entered: 05/20/2022)
08/17/2022	<u>15</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF THE TREASURY. (DeGenaro, Stephen) (Entered: 08/17/2022)
11/14/2022	<u>16</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF THE TREASURY. (Venguswamy, Kartik) (Entered: 11/14/2022)
01/27/2023	<u>17</u>	MOTION for Hearing – <i>Status Conference</i> by CHAM BANK S.A.. (Attachments: # <u>1</u> Text of Proposed Order Granting Status Conference)(Baloul, Gassan) (Entered: 01/27/2023)
01/29/2023		MINUTE ORDER: The Court is in receipt of Plaintiff's <u>17</u> Motion for a Status Conference. Plaintiff evidently intends to request, during a status conference, that the Court (1) set a schedule for Defendant to complete its FOIA productions and (2) permit Plaintiff to move to amend its complaint to add claims beyond FOIA, currently the sole basis of its operative complaint. Because a status conference is unnecessary for Plaintiff to move for such relief, Plaintiff's <u>17</u> Motion for a Status Conference is DENIED WITHOUT PREJUDICE . Briefly, the Court notes that, consistent with longstanding appellate precedent, the Court does not generally order more expeditious productions in FOIA cases. <i>See Open Am. v. Watergate Special Prosecution Force</i> , 547 F.2d 605, 615–16 (D.C. Cir. 1976) (precluding injunctive relief expediting a FOIA request in the absence of "exceptional circumstances"); <i>In re Barr Labs., Inc.</i> , 930 F.2d 72, 75 (D.C. Cir. 1991) (more generally precluding "a judicial order putting [a plaintiff] at the head of [a] queue [only to] move[] all others back one space and produce[] no net gain"). Signed by Judge Colleen Kollar-Kotelly on January 29, 2023. (lcckk1) (Entered: 01/29/2023)
02/07/2023	<u>18</u>	WITHDRAWN PURSUANT TO NOTICE FILED 05/02/2023.....MOTION to Amend/Correct <i>Complaint</i> by CHAM BANK S.A.. (Attachments: # <u>1</u> Exhibit A – FIRST AMENDED COMPLAINT, # <u>2</u> Exhibit 1 – to First Amended Complaint, # <u>3</u> Exhibit 2 – to First Amended Complaint, # <u>4</u> Text of Proposed Order (Exhibit B) Granting Motion for Leave to File Amended Complaint)(Baloul, Gassan) Modified on 5/3/2023 (zjm). (Entered: 02/07/2023)
02/13/2023	<u>19</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF THE TREASURY. (DeGenaro, Stephen) (Entered: 02/13/2023)
02/21/2023	<u>20</u>	Memorandum in opposition to re <u>18</u> Motion to Amend/Correct, filed by U.S. DEPARTMENT OF THE TREASURY. (Attachments: # <u>1</u> Text of Proposed Order)(DeGenaro, Stephen) (Entered: 02/21/2023)
02/28/2023	<u>21</u>	REPLY to opposition to motion re <u>18</u> MOTION to Amend/Correct <i>Complaint</i> filed by CHAM BANK S.A.. (Baloul, Gassan) (Entered: 02/28/2023)
05/02/2023	<u>22</u>	NOTICE OF RELATED CASE by CHAM BANK S.A.. Case related to Case No. 1:23-cv-01212. (Baloul, Gassan) (Entered: 05/02/2023)
05/02/2023	<u>23</u>	NOTICE OF WITHDRAWAL OF MOTION by CHAM BANK S.A. re <u>18</u> MOTION to Amend/Correct <i>Complaint</i> (Baloul, Gassan) (Entered: 05/02/2023)
05/15/2023	<u>24</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF THE TREASURY. (Venguswamy, Kartik) (Entered: 05/15/2023)
08/10/2023	<u>25</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF THE TREASURY. (DeGenaro, Stephen) (Entered: 08/10/2023)
09/22/2023	<u>26</u>	STIPULATION of Dismissal <i>Joint</i> by CHAM BANK S.A.. (Baloul, Gassan) (Entered: 09/22/2023)
09/22/2023	<u>27</u>	ORDER dismissing case without prejudice. The Clerk of Court is respectfully directed to close this case. Signed by Judge Colleen Kollar-Kotelly on September 22, 2023. (lcckk1) (Entered: 09/22/2023)