

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:21-cv-02292-APM**

HUMAN RIGHTS DEFENSE CENTER v. U.S. SECRET
SERVICE et al
Assigned to: Judge Amit P. Mehta
Cause: 05:552 Freedom of Information Act

Date Filed: 08/30/2021
Date Terminated: 10/19/2023
Jury Demand: None
Nature of Suit: 895 Freedom of
Information Act
Jurisdiction: Federal Question

Plaintiff

**HUMAN RIGHTS DEFENSE
CENTER**

represented by **Daniel Lucas Marshall**
HUMAN RIGHTS DEFENSE CENTER
P.O. Box 1151
Lake Worth, FL 33460
561-319-1527
Email: dmarshall@hrdc-law.org
ATTORNEY TO BE NOTICED

Deborah Maxine Golden
THE LAW OFFICE OF DEBORAH M.
GOLDEN
700 Pennsylvania Avenue, SE
2nd Floor
Washington, DC 20003
(202) 630-0332
Email: dgolden@debgoldenlaw.com
ATTORNEY TO BE NOTICED

V.

Defendant

U.S. SECRET SERVICE

represented by **Christina O'Tousa**
DOJ-USAO
601 D Street NW
Washington, DC 20530
(202) 252-2437
Email: christina.o'tousa@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Stephen DeGenaro
U.S. ATTORNEY'S OFFICE FOR THE
DISTRICT OF COLUMBIA
601 D Street, NW
Washington, DC 20530
(202) 252-7229
Fax: (202) 252-2599
Email: Stephen.DeGenaro@usdoj.gov
TERMINATED: 11/04/2022
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

EOUSA

represented by **Christina O'Tousa**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Stephen DeGenaro
 (See above for address)
 TERMINATED: 11/04/2022
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
08/30/2021	<u>1</u>	COMPLAINT against All Defendants (Filing fee \$ 402 receipt number ADCDC-8699541) filed by HUMAN RIGHTS DEFENSE CENTER. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Summons to EOUSA, # <u>3</u> Summons to USAG, # <u>4</u> Summons to USAO, # <u>5</u> Summons to Sec Ser)(Golden, Deborah) (Entered: 08/30/2021)
08/30/2021		Case Assigned to Judge Amit P. Mehta. (adh,) (Entered: 08/30/2021)
08/30/2021	<u>2</u>	SUMMONS (4) Issued Electronically as to EOUSA, SECRET SERVICE, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent)(adh,) (Entered: 08/30/2021)
09/01/2021	<u>3</u>	NOTICE of Appearance by Daniel Lucas Marshall on behalf of HUMAN RIGHTS DEFENSE CENTER (Marshall, Daniel) (Main Document 3 replaced on 9/3/2021) (zeg). (Entered: 09/01/2021)
09/24/2021	<u>4</u>	NOTICE of Appearance by Stephen DeGenaro on behalf of All Defendants (DeGenaro, Stephen) (Entered: 09/24/2021)
09/24/2021	<u>5</u>	Consent MOTION for Extension of Time to <i>Respond to the Complaint</i> by EOUSA, U.S. SECRET SERVICE. (Attachments: # <u>1</u> Text of Proposed Order)(DeGenaro, Stephen) (Entered: 09/24/2021)
09/24/2021		MINUTE ORDER granting <u>5</u> Motion for Extension of Time to Respond to the Complaint. Defendants' response to Plaintiff's Complaint shall now be due on or before November 10, 2021. Signed by Judge Amit P. Mehta on 9/24/2021. (lcapm2) (Entered: 09/24/2021)
11/10/2021	<u>6</u>	ANSWER to Complaint by EOUSA, U.S. SECRET SERVICE.(DeGenaro, Stephen) (Entered: 11/10/2021)
11/10/2021	<u>7</u>	ORDER. Both a Complaint and an Answer are now before the court in this FOIA case. It is hereby ordered that the parties shall meet and confer and file a Joint Status Report on or before November 24, 2021. The Joint Status Report shall include (1) the status of Plaintiff's FOIA request; (2) the anticipated number of documents responsive to Plaintiff's FOIA request; (3) the anticipated date(s) for release of the documents requested by Plaintiff; (4) whether a motion for stay is likely under <i>Open America v. Watergate Special Prosecution Force</i> , 547 F.2d 605 (D.C. Cir. 1976); and (5) whether the parties anticipate summary judgment briefing and, if so, a proposed briefing schedule. See attached Order for details. Signed by Judge Amit P. Mehta on 11/10/2021. (lcapm2) (Entered: 11/10/2021)
11/24/2021	<u>8</u>	Joint STATUS REPORT by HUMAN RIGHTS DEFENSE CENTER. (Attachments: # <u>1</u> Text of Proposed Order)(Golden, Deborah) (Entered: 11/24/2021)
11/29/2021		MINUTE ORDER. The parties shall file an additional Joint Status Report by January 10, 2022, which updates the court on the processing and production of responsive records. Signed by Judge Amit P. Mehta on 11/29/2021. (lcapm2) (Entered: 11/29/2021)
01/10/2022	<u>9</u>	Joint STATUS REPORT by EOUSA, U.S. SECRET SERVICE. (Attachments: # <u>1</u> Text of Proposed Order)(DeGenaro, Stephen) (Entered: 01/10/2022)
01/11/2022		MINUTE ORDER. The parties shall file an additional Joint Status Report by February 24, 2022, which updates the court on the processing and production of responsive records. Signed by Judge Amit P. Mehta on 1/11/2022. (lcapm2) (Entered: 01/11/2022)
02/24/2022	<u>10</u>	Joint STATUS REPORT by EOUSA, U.S. SECRET SERVICE. (Attachments: # <u>1</u> Text of Proposed Order)(DeGenaro, Stephen) (Entered: 02/24/2022)

02/24/2022		MINUTE ORDER. The parties shall file an additional Joint Status Report by April 11, 2022, which updates the court on the processing and production of responsive records. Signed by Judge Amit P. Mehta on 2/24/2022. (lcapm2) (Entered: 02/24/2022)
04/11/2022	<u>11</u>	Joint STATUS REPORT by EOUSA, U.S. SECRET SERVICE. (Attachments: # <u>1</u> Text of Proposed Order)(DeGenaro, Stephen) (Entered: 04/11/2022)
04/12/2022		MINUTE ORDER. The parties shall file an additional Joint Status Report by May 26, 2022, which updates the court on the processing and production of responsive records. Signed by Judge Amit P. Mehta on 4/12/2022. (lcapm2) (Entered: 04/12/2022)
04/12/2022		Set/Reset Deadlines: Status Report due by 5/26/2022 (zjch,) (Entered: 04/13/2022)
05/26/2022	<u>12</u>	Joint STATUS REPORT by EOUSA, U.S. SECRET SERVICE. (Attachments: # <u>1</u> Text of Proposed Order)(DeGenaro, Stephen) (Entered: 05/26/2022)
05/27/2022		MINUTE ORDER. The parties shall file an additional Joint Status Report by July 11, 2022, which updates the court on the processing and production of responsive records. Signed by Judge Amit P. Mehta on 5/27/2022. (lcapm2) (Entered: 05/27/2022)
07/11/2022	<u>13</u>	Joint STATUS REPORT by EOUSA, U.S. SECRET SERVICE. (Attachments: # <u>1</u> Text of Proposed Order)(DeGenaro, Stephen) (Entered: 07/11/2022)
07/12/2022		MINUTE ORDER. The parties shall file an additional Joint Status Report by August 25, 2022, which advises whether any disputes remain and, if so, proposes a summary judgment briefing schedule. Signed by Judge Amit P. Mehta on 7/12/2022. (lcapm2) (Entered: 07/12/2022)
08/25/2022	<u>14</u>	Joint STATUS REPORT by EOUSA, U.S. SECRET SERVICE. (Attachments: # <u>1</u> Text of Proposed Order)(DeGenaro, Stephen) (Entered: 08/25/2022)
08/26/2022		MINUTE ORDER. The parties shall file an additional Joint Status Report by October, 11, 2022, which advises whether any disputes remain and, if so, proposes a summary judgment briefing schedule. Signed by Judge Amit P. Mehta on 8/26/2022. (lcapm2) (Entered: 08/26/2022)
10/11/2022	<u>15</u>	Joint STATUS REPORT by HUMAN RIGHTS DEFENSE CENTER. (Attachments: # <u>1</u> Text of Proposed Order)(Golden, Deborah) (Entered: 10/11/2022)
10/12/2022		MINUTE ORDER. The parties shall file an additional Joint Status Report by December 9, 2022 which advises whether any disputes remain and, if so, proposes a summary judgment briefing schedule. Signed by Judge Amit P. Mehta on 10/12/2022. (lcapm2) (Entered: 10/12/2022)
11/04/2022	<u>16</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Christina O'Tousa on behalf of EOUSA, U.S. SECRET SERVICE Substituting for attorney Stephen DeGenaro (O'Tousa, Christina) (Entered: 11/04/2022)
12/09/2022	<u>17</u>	Joint STATUS REPORT by EOUSA, U.S. SECRET SERVICE. (O'Tousa, Christina) (Entered: 12/09/2022)
12/12/2022		MINUTE ORDER. The parties shall file an additional Joint Status Report by February 7, 2023, which proposes a schedule for further proceedings if necessary. Signed by Judge Amit P. Mehta on 12/12/2022. (lcapm2) (Entered: 12/12/2022)
02/06/2023	<u>18</u>	Joint STATUS REPORT by EOUSA, U.S. SECRET SERVICE. (O'Tousa, Christina) (Entered: 02/06/2023)
02/07/2023		MINUTE ORDER. The parties shall file an additional Joint Status Report by April 7, 2023, which advises whether any dispute remains concerning fees and costs and, if so, proposes a schedule for further proceedings. Signed by Judge Amit P. Mehta on 2/7/2023. (lcapm2) (Entered: 02/07/2023)
04/07/2023	<u>19</u>	Joint STATUS REPORT by EOUSA, U.S. SECRET SERVICE. (O'Tousa, Christina) (Entered: 04/07/2023)
04/10/2023		MINUTE ORDER. Plaintiff's Motion for Attorney's Fees shall be due on or before June 6, 2023. Defendant's Opposition shall be due on or before July 7, 2023. Plaintiff's Reply shall be due on or before July 21, 2023. The court does not see a need to hold a status conference at this time. Signed by Judge Amit P. Mehta on 4/10/2023. (lcapm2)

		(Entered: 04/10/2023)
06/06/2023	<u>20</u>	Joint MOTION to Vacate <i>Briefing Schedule</i> by HUMAN RIGHTS DEFENSE CENTER. (Golden, Deborah) (Entered: 06/06/2023)
06/07/2023		MINUTE ORDER granting <u>20</u> Joint Motion to Vacate Briefing Schedule. The parties shall file a Joint Status Report on or before August 7, 2023, updating the court as to the status of their settlement negotiations, if a stipulation of dismissal has not yet been filed. Signed by Judge Amit P. Mehta on 6/7/2023. (lcapm2) (Entered: 06/07/2023)
08/06/2023	<u>21</u>	Consent MOTION for Extension of Time to <i>File Joint Status Report</i> by EOUSA, U.S. SECRET SERVICE. (O'Tousa, Christina) (Entered: 08/06/2023)
08/08/2023		MINUTE ORDER granting <u>21</u> Consent Motion for Extension of Time to File Joint Status Report. The parties shall file a Joint Status Report by August 21, 2023, which updates the court on the status of settlement, unless a stipulation of dismissal is filed on or before that date. Signed by Judge Amit P. Mehta on 08/08/2023. (lcapm2) (Entered: 08/08/2023)
08/21/2023	<u>22</u>	Joint STATUS REPORT by EOUSA, U.S. SECRET SERVICE. (O'Tousa, Christina) (Entered: 08/21/2023)
08/22/2023		MINUTE ORDER. The parties shall file a Joint Status Report by October 20, 2023, which updates the court on the status of settlement, unless a stipulation of dismissal is filed on or before that date. Signed by Judge Amit P. Mehta on 08/22/2023. (lcapm2) (Entered: 08/22/2023)
10/19/2023	<u>23</u>	STIPULATION of Dismissal by EOUSA, U.S. SECRET SERVICE. (O'Tousa, Christina) (Entered: 10/19/2023)