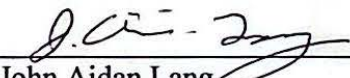


EXHIBIT A

5. The SSA notified Ropes & Gray on May 23, 2022 that seven of our requests were overbroad because they requested “[a]ll correspondence” concerning certain categories of information. The SSA additionally asked that we provide date ranges for six other requests, as well as a list of custodians whose files should be searched and search terms to be applied. (This email correspondence contains Ropes & Gray’s original FOIA requests and is included as Exhibit C.) We provided the requested information on June 1, 2022.
6. SSA again followed up with Ropes & Gray, seeking additional clarification regarding one of our requests on June 17, 2022. We provided that information on June 21, 2022.
7. On September 22, 2022, Ropes & Gray requested another update on the status of our request, however, the SSA did not respond.
8. On January 13, 2023, Ropes & Gray contacted the U.S. Office of Government Information Services (“OGIS”) and Director Alina Semo to seek assistance through OGIS’s FOIA ombudsman service. On February 8, 2023, we received a response from OGIS staff at the National Archives and Records Administration (“NARA”) stating that the “SSA is consulting with their Office of General Law” regarding our request and anticipated “provid[ing] an interim response by March 10, 2023.” The SSA never provided an interim response.
9. On October 13, 2023, we contacted the SSA a final time to inquire again about the status of our FOIA request. The SSA responded that the agency was “in receipt” of our email. On October 24, 2023, an information specialist named Ms. Woods confirmed that responsive documents existed, but noted that no searches had yet been conducted since we had submitted our FOIA request. Ms. Woods also indicated that the cost of producing documents would be extremely high, though the SSA has not yet provided a cost estimate.
10. To date, Ropes & Gray has not received a single document in the roughly twenty-two months since we first submitted our FOIA request. Ropes & Gray has therefore brought the above-referenced civil action to remedy the SSA’s failure to substantively respond to our FOIA request within the generally applicable statutory time limit.

Signed under the pains and penalties of perjury on November 22, 2023.


John Aidan Lang