### U.S. District Court District of Columbia (Washington, DC) CIVIL DOCKET FOR CASE #: 1:21-cv-03065-JEB

# CONNELL v. UNITED STATES CENTRAL INTELLIGENCEDate Filed: 11/18/2021AGENCY et alJury Demand: NoneAssigned to: Chief Judge James E. BoasbergNature of Suit: 895 FreCause: 05:552 Freedom of Information ActInformation Act

#### **Plaintiff**

#### JAMES G. CONNELL, III

Date Filed: 11/18/2021 Jury Demand: None Nature of Suit: 895 Freedom of Information Act Jurisdiction: U.S. Government Defendant

### represented by JAMES G. CONNELL, III

7604 Edenwood Ct. Bethesda, MD 20817 703–623–8410 PRO SE

#### James G. Connell, III

CONNELL LAW PO Box 141 Cabin John, MD 20818 (703) 623–8410 Email: jconnell@connell\_law.com ATTORNEY TO BE NOTICED

V.

#### **Defendant**

#### UNITED STATES CENTRAL INTELLIGENCE AGENCY

#### represented by Alexander Schreiber

DOJ–USAO Civil 601 D Street NW Washington, DC 20530 202–252–6754 Email: <u>alexander.schreiber@usdoj.gov</u> *TERMINATED: 08/29/2024 LEAD ATTORNEY ATTORNEY TO BE NOTICED* 

#### Christina O'Tousa

DOJ–USAO 601 D Street NW Washington, DC 20530 (202) 252–2437 Email: <u>christina.o'tousa@usdoj.gov</u> LEAD ATTORNEY ATTORNEY TO BE NOTICED

#### **Thomas Anthony Quinn**

DOJ–USAO Civil Division 555 4th Street, NW Washington, DC 20530 (202) 252–7558 Fax: (202) 252–2599 Email: tony.quinn2@usdoj.gov TERMINATED: 11/11/2022 LEAD ATTORNEY ATTORNEY TO BE NOTICED

#### FEDERAL BURAEU OF **INVESTIGATION**

## represented by Alexander Schreiber (See above for address)

TERMINATED: 08/29/2024 LEAD ATTORNEY ATTORNEY TO BE NOTICED

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

#### **Thomas Anthony Quinn**

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

Date Filed	#	Docket Text
11/18/2021	1	COMPLAINT against All Defendants (Filing fee \$ 402 receipt number CDCDC–8876086) filed by JAMES G. CONNELL, III. (Attachments: # <u>1</u> Summons FBI Summons, # <u>2</u> Summons CIA Summons, # <u>3</u> Summons AG Summons, # <u>4</u> Summons ADC Summons, # <u>5</u> Civil Cover Sheet Civil Cover Sheet)(Connell, James) (Entered: 11/18/2021)
11/19/2021		Case Assigned to Judge James E. Boasberg. (znmg) (Entered: 11/19/2021)
11/19/2021	<u>2</u>	SUMMONS (4) Issued Electronically as to All Defendants, U.S. Attorney and U.S. Attorney General (Attachment: # 1 Notice and Consent)(znmg) (Entered: 11/19/2021)
12/01/2021	<u>3</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 11/29/2021. Answer due for ALL FEDERAL DEFENDANTS by 12/29/2021. (Connell, James) Modified serve/due date on 12/2/2021 (zeg). (Entered: 12/01/2021)
12/01/2021	4	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. FEDERAL BURAEU OF INVESTIGATION served on 11/30/2021. (See Docket Entry <u>3</u> to view document). (zeg) (Entered: 12/02/2021)
12/29/2021	<u>5</u>	NOTICE of Appearance by Thomas Anthony Quinn on behalf of FEDERAL BURAEU OF INVESTIGATION, UNITED STATES CENTRAL INTELLIGENCE AGENCY (Quinn, Thomas) (Entered: 12/29/2021)
12/29/2021	<u>6</u>	Unopposed MOTION for Extension of Time to File <i>Response to Complaint</i> by FEDERAL BURAEU OF INVESTIGATION, UNITED STATES CENTRAL INTELLIGENCE AGENCY. (Attachments: # <u>1</u> Text of Proposed Order)(Quinn, Thomas) (Entered: 12/29/2021)
12/29/2021		MINUTE ORDER GRANTING Unopposed <u>6</u> Motion for Extension of Time. The Court ORDERS that Defendants shall file their Answer or otherwise respond to Plaintiff's Complaint by February 1, 2022. So ORDERED by Judge James E. Boasberg on 12/29/2021. (lcjeb1) (Entered: 12/29/2021)
12/29/2021		Set/Reset Deadlines: Answer due by 2/1/2022. (nbn) (Entered: 12/29/2021)
01/31/2022	7	ENTERED IN ERRORUnopposed MOTION for Extension of Time to <i>File a Response to Complaint</i> by FEDERAL BURAEU OF INVESTIGATION, UNITED STATES CENTRAL INTELLIGENCE AGENCY. (Attachments: # <u>1</u> Text of Proposed Order)(Quinn, Thomas) Modified on 2/1/2022 (ztth). (Entered: 01/31/2022)
02/01/2022		ENTERED IN ERROR AT THE DIRECTION OF CHAMBERSMINUTE ORDER GRANTING Unopposed <u>7</u> Motion for Extension of Time. The Court ORDERS that Defendants shall file their Answer or otherwise respond to Plaintiff's Complaint by February 28, 2022. So ORDERED by Judge James E. Boasberg on 2/1/2022. (lcjeb1); Modified on 2/1/2022 (ztth). (Entered: 02/01/2022)

02/01/2022		NOTICE OF ERROR re <u>7</u> Motion for Extension of Time to; emailed to tony.quinn2@usdoj.gov, cc'd 4 associated attorneys — The PDF file you docketed contained errors: 1. Incorrect header/caption/case number, 2. Document filed in the wrong case number. (ztth); Modified text on 2/1/2022 (ztth). (Entered: 02/01/2022)
02/01/2022	<u>8</u>	MOTION for Extension of Time to <i>Respond to Complaint – CORRECTED</i> by FEDERAL BURAEU OF INVESTIGATION, UNITED STATES CENTRAL INTELLIGENCE AGENCY. (Attachments: # <u>1</u> Text of Proposed Order)(Quinn, Thomas) (Entered: 02/01/2022)
02/01/2022		MINUTE ORDER GRANTING Unopposed <u>8</u> Motion for Extension of Time. The Court ORDERS that Defendants shall file their Answer or otherwise respond to Plaintiff's Complaint by February 15, 2022. So ORDERED by Judge James E. Boasberg on 2/1/2022. (lcjeb1) (Entered: 02/01/2022)
02/01/2022		Set/Reset Deadlines: Answer due by 2/15/2022. (znbn) (Entered: 02/02/2022)
02/15/2022	2	MOTION to Dismiss by FEDERAL BURAEU OF INVESTIGATION. (Attachments: # 1 Memorandum in Support, # 2 Statement of Facts, # 3 Declaration, # 4 Text of Proposed Order)(Quinn, Thomas). Added MOTION for Partial Summary Judgment on 2/16/2022 (ztth). (Entered: 02/15/2022)
02/24/2022	<u>10</u>	STIPULATION of Dismissal by FEDERAL BURAEU OF INVESTIGATION. (Quinn, Thomas) (Entered: 02/24/2022)
02/25/2022		MINUTE ORDER: Per the parties' <u>10</u> Stipulation, the Court ORDERS that: 1) The FBI only is DISMISSED WITHOUT PREJUDICE; 2) Its <u>9</u> Motion is TERMINATED as moot; and 3) The CIA shall respond to the Complaint by March 14, 2022. So ORDERED by Judge James E. Boasberg on 2/25/2022. (lcjeb1) (Entered: 02/25/2022)
02/25/2022		Set/Reset Deadlines: Responses due by 3/14/2022. (znbn) (Entered: 03/01/2022)
03/14/2022	<u>11</u>	ANSWER to Complaint by UNITED STATES CENTRAL INTELLIGENCE AGENCY.(Quinn, Thomas) (Entered: 03/14/2022)
03/15/2022		MINUTE ORDER: The Court ORDERS that the parties shall confer and submit a joint proposed briefing schedule by March 29, 2022. So ORDERED by Judge James E. Boasberg on 3/15/2022. (lcjeb1) (Entered: 03/15/2022)
03/15/2022		Set/Reset Deadlines: Joint Proposed Briefing Schedule due by 3/29/2022. (nbn) (Entered: 03/15/2022)
03/30/2022	<u>12</u>	Joint STATUS REPORT by JAMES G. CONNELL, III. (Connell, James) (Entered: 03/30/2022)
03/30/2022		MINUTE ORDER: The Court ADOPTS the parties' <u>12</u> Joint Status Report and ORDERS that they shall file a further joint status report by June 27, 2022. So ORDERED by Judge James E. Boasberg on 3/30/2022. (lcjeb1) (Entered: 03/30/2022)
03/30/2022		Set/Reset Deadlines: Joint Status Report due by 6/27/2022. (nbn) (Entered: 03/30/2022)
06/27/2022	<u>13</u>	STATUS REPORT by UNITED STATES CENTRAL INTELLIGENCE AGENCY. (Quinn, Thomas) (Entered: 06/27/2022)
06/28/2022		MINUTE ORDER: The Court ADOPTS Defendant's <u>13</u> Status Report and ORDERS that the parties shall file a further joint status report by July 29, 2022. So ORDERED by Judge James E. Boasberg on 6/28/2022. (lcjeb1) (Entered: 06/28/2022)
06/28/2022		Set/Reset Deadlines: Joint Status Report due by 7/29/2022. (nbn) (Entered: 06/28/2022)
07/29/2022	<u>14</u>	Joint STATUS REPORT by UNITED STATES CENTRAL INTELLIGENCE AGENCY. (Quinn, Thomas) (Entered: 07/29/2022)
07/29/2022		MINUTE ORDER: The Court ADOPTS the parties' <u>14</u> Joint Status Report and ORDERS that the parties shall file a further joint status report by September 30, 2022. So ORDERED by Judge James E. Boasberg on 7/29/2022. (lcjeb1) (Entered: 07/29/2022)

08/01/2022		Set/Reset Deadlines: Joint Status Report due by 9/30/2022 (lsj) (Entered: 08/01/2022)
09/30/2022	<u>15</u>	STATUS REPORT by UNITED STATES CENTRAL INTELLIGENCE AGENCY. (Quinn, Thomas) (Entered: 09/30/2022)
10/03/2022		MINUTE ORDER: The Court ADOPTS Defendant CIA's <u>15</u> Status Report and ORDERS that the parties shall file a further joint status report by December 30, 2022. So ORDERED by Judge James E. Boasberg on 10/3/2022. (lcjeb1) (Entered: 10/03/2022)
10/03/2022		Set/Reset Deadlines: Joint Status Report due by 12/30/2022. (nbn) (Entered: 10/03/2022)
11/11/2022	<u>16</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Christina O'Tousa on behalf of FEDERAL BURAEU OF INVESTIGATION, UNITED STATES CENTRAL INTELLIGENCE AGENCY Substituting for attorney Thomas Anthony Quinn (O'Tousa, Christina) (Entered: 11/11/2022)
12/30/2022	<u>17</u>	Joint STATUS REPORT by UNITED STATES CENTRAL INTELLIGENCE AGENCY. (O'Tousa, Christina) (Entered: 12/30/2022)
12/30/2022		MINUTE ORDER: The Court ADOPTS the parties' <u>17</u> Joint Status Report and ORDERS that they shall file a further Joint Status Report by March 30, 2023. So ORDERED by Judge James E. Boasberg on 12/30/2022. (lcjeb1) (Entered: 12/30/2022)
12/30/2022		Set/Reset Deadlines: Joint Status Report due by 3/30/2023. (nbn) (Entered: 01/04/2023)
03/30/2023	<u>18</u>	Joint STATUS REPORT by UNITED STATES CENTRAL INTELLIGENCE AGENCY. (O'Tousa, Christina) (Entered: 03/30/2023)
03/31/2023		MINUTE ORDER: The Court ADOPTS the parties' <u>18</u> Joint Status Report and ORDERS that they shall file a further Joint Status Report by June 28, 2023. So ORDERED by Chief Judge James E. Boasberg on 3/31/2023. (lcjeb1) (Entered: 03/31/2023)
03/31/2023		Set/Reset Deadlines: Joint Status Report due by 6/28/2023 (lsj) (Entered: 03/31/2023)
06/28/2023	<u>19</u>	Joint STATUS REPORT by UNITED STATES CENTRAL INTELLIGENCE AGENCY. (O'Tousa, Christina) (Entered: 06/28/2023)
06/28/2023		MINUTE ORDER: The Court ADOPTS the parties' <u>19</u> Joint Status Report and ORDERS that they shall file a further Joint Status Report by October 2, 2023. So ORDERED by Chief Judge James E. Boasberg on 6/28/2023. (lcjeb1) (Entered: 06/28/2023)
06/29/2023		Set/Reset Deadlines: Joint Status Report due by 10/2/2023. (znbn) (Entered: 06/29/2023)
10/02/2023	<u>20</u>	MOTION for Extension of Time to <i>File Joint Status Report</i> by UNITED STATES CENTRAL INTELLIGENCE AGENCY. (O'Tousa, Christina) (Entered: 10/02/2023)
10/03/2023		MINUTE ORDER: The Court ORDERS that: 1) The <u>20</u> Motion for Extension of Time is GRANTED; and 2) The parties shall file their Joint Status Report by October 5, 2023. So ORDERED Chief Judge James E. Boasberg on 10/3/2023. (lcjeb1) (Entered: 10/03/2023)
10/03/2023		Set/Reset Deadlines: Joint Status Report due by 10/5/2023. (nbn) (Entered: 10/03/2023)
10/05/2023	<u>21</u>	Joint STATUS REPORT by UNITED STATES CENTRAL INTELLIGENCE AGENCY. (O'Tousa, Christina) (Entered: 10/05/2023)
10/06/2023		MINUTE ORDER: The Court ADOPTS the parties' <u>21</u> Joint Status Report and ORDERS that they shall file a further Joint Status Report by January 4, 2024. So ORDERED by Chief Judge James E. Boasberg on 10/6/2023. (lcjeb1) (Entered: 10/06/2023)

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10/06/2023		Set/Reset Deadlines: Joint Status Report due by 1/4/2024. (nbn) (Entered: 10/06/2023)
01/04/2024	<u>22</u>	Consent MOTION for Extension of Time to <i>File Joint Status Report</i> by UNITED STATES CENTRAL INTELLIGENCE AGENCY. (O'Tousa, Christina) (Entered: 01/04/2024)
01/05/2024		MINUTE ORDER: The Court ORDERS that: 1) The <u>22</u> Motion for Extension of Time is GRANTED; and 2) The parties shall file their Joint Status Report by January 10, 2024. So ORDERED by Chief Judge James E. Boasberg on 1/5/2024. (lcjeb1) (Entered: 01/05/2024)
01/05/2024		Set/Reset Deadlines: Joint Status Report due by 1/10/2024. (znbn) (Entered: 01/05/2024)
01/10/2024	<u>23</u>	Joint STATUS REPORT by UNITED STATES CENTRAL INTELLIGENCE AGENCY. (O'Tousa, Christina) (Entered: 01/10/2024)
01/11/2024		MINUTE ORDER: The Court ADOPTS the parties' <u>23</u> Joint Status Report and ORDERS that they shall file a further Joint Status Report by April 3, 2024. So ORDERED by Chief Judge James E. Boasberg on 1/11/2024. (lcjeb1) (Entered: 01/11/2024)
01/11/2024		Set/Reset Deadlines: Joint Status Report due by 4/3/2024. (znbn) (Entered: 01/11/2024)
04/03/2024	<u>24</u>	Joint STATUS REPORT by UNITED STATES CENTRAL INTELLIGENCE AGENCY. (O'Tousa, Christina) (Entered: 04/03/2024)
04/04/2024		MINUTE ORDER: The Court ADOPTS the parties' <u>24</u> Joint Status Report and ORDERS that they shall file a further Joint Status Report by July 9, 2024. So ORDERED by Chief Judge James E. Boasberg on 4/4/2024. (lcjeb1) (Entered: 04/04/2024)
04/04/2024		Set/Reset Deadlines: Joint Status Report due by 7/9/2024. (znbn) (Entered: 04/04/2024)
07/09/2024	<u>25</u>	NOTICE of Appearance by Alexander Schreiber on behalf of All Defendants (Schreiber, Alexander) (Entered: 07/09/2024)
07/09/2024	<u>26</u>	Joint STATUS REPORT by UNITED STATES CENTRAL INTELLIGENCE AGENCY. (Schreiber, Alexander) (Entered: 07/09/2024)
07/10/2024		MINUTE ORDER: The Court ADOPTS the parties' <u>26</u> Joint Status Report and ORDERS that they shall file a further joint status report by October 7, 2024. So ORDERED by Chief Judge James E. Boasberg on July 10, 2024. (lcjeb4) (Entered: 07/10/2024)
07/10/2024		Set/Reset Deadlines: Joint Status Report due by 10/7/2024. (znbn) (Entered: 07/10/2024)
07/10/2024		Set/Reset Deadlines: Joint Status Report due by 10/7/2024. (znbn) (Entered: 07/12/2024)
08/29/2024	<u>27</u>	NOTICE OF WITHDRAWAL OF APPEARANCE as to FEDERAL BURAEU OF INVESTIGATION, UNITED STATES CENTRAL INTELLIGENCE AGENCY. Attorney Alexander Schreiber terminated. (O'Tousa, Christina) (Entered: 08/29/2024)