

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:21-cv-03069-TJK**

CONNELL v. UNITED STATES CENTRAL INTELLIGENCE AGENCY et al
Assigned to: Judge Timothy J. Kelly
Cause: 05:552 Freedom of Information Act
Date Filed: 11/19/2021
Jury Demand: None
Nature of Suit: 895 Freedom of Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

JAMES G. CONNELL, III

represented by **JAMES G. CONNELL, III**
7604 Edenwood Ct.
Bethesda, MD 20817
703-623-8410
PRO SE

James G. Connell , III
CONNELL LAW
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(703) 623-8410
Email: jconnell@connell-law.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

**UNITED STATES CENTRAL
INTELLIGENCE AGENCY**

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

Marsha Wellknown Yee
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TERMINATED: 11/16/2023
LEAD ATTORNEY
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Diana Viggiano Valdivia
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601 D Street NW
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Washington, DC 20530
202-252-2545
Email: diana.valdivia@usdoj.gov
TERMINATED: 11/17/2022

Defendant

represented by

**UNITED STATES SOUTHERN
COMMAND**

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

Marsha Wellknown Yee
(See above for address)
TERMINATED: 11/16/2023
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Diana Viggiano Valdivia
(See above for address)
TERMINATED: 11/17/2022

Defendant

DEPARTMENT OF DEFENSE

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

Marsha Wellknown Yee
(See above for address)
TERMINATED: 11/16/2023
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Diana Viggiano Valdivia
(See above for address)
TERMINATED: 11/17/2022

Date Filed	#	Docket Text
11/19/2021	<u>1</u>	COMPLAINT against All Defendants (Filing fee \$ 402 receipt number ADCDC-8879315) filed by JAMES G. CONNELL, III. (Attachments: # <u>1</u> Civil Cover Sheet Civil Cover Sheet, # <u>2</u> Summons Summons ADC, # <u>3</u> Summons Summons AG, # <u>4</u> Summons Summons CIA, # <u>5</u> Summons Summons DoD, # <u>6</u> Summons Summons SOUTHCOM)(Connell, James) (Entered: 11/19/2021)
11/19/2021		Case Assigned to Judge Timothy J. Kelly. (zsb) (Entered: 11/19/2021)
11/19/2021	<u>2</u>	SUMMONS (5) Issued Electronically as to DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent)(adh,) (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 11/30/2021. Answer due for ALL FEDERAL DEFENDANTS by 12/30/2021. (Connell, James) (Entered: 12/01/2021)
12/27/2021	<u>4</u>	NOTICE of Appearance by Diana Viggiano Valdivia on behalf of All Defendants (Valdivia, Diana) (Entered: 12/27/2021)
12/27/2021	<u>5</u>	Unopposed MOTION for Extension of Time to File Answer <i>or Otherwise Respond to Complaint</i> by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (Attachments: # <u>1</u> Text of Proposed Order)(Valdivia, Diana) (Entered: 12/27/2021)
12/30/2021		MINUTE ORDER granting Defendants' <u>5</u> Unopposed Motion for Extension of Time. It is hereby ORDERED, for good cause shown, that Defendants' <u>5</u> Unopposed Motion is GRANTED. It is further ORDERED that Defendants shall respond to Plaintiff's <u>1</u> Complaint by January 31, 2022. Signed by Judge Timothy J. Kelly on 12/30/2021. (lctjk2) (Entered: 12/30/2021)

01/31/2022	<u>6</u>	ANSWER to Complaint by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Exhibit D, # <u>5</u> Exhibit E)(Valdivia, Diana) (Entered: 01/31/2022)
02/01/2022		MINUTE ORDER: Before the Court in this FOIA case are a complaint and an answer. It is hereby ORDERED that the parties shall meet, confer, and file a joint proposed schedule for briefing or disclosure by February 25, 2022. Signed by Judge Timothy J. Kelly on 02/01/2022. (lctjk2) (Entered: 02/01/2022)
02/25/2022	<u>7</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (Valdivia, Diana) (Entered: 02/25/2022)
02/26/2022		MINUTE ORDER: Upon consideration of the <u>7</u> Joint Status Report, it is hereby ORDERED that the parties shall file a further joint status report by May 26, 2022, including, if necessary, a jointly proposed schedule for briefing or disclosure. Signed by Judge Timothy J. Kelly on 02/26/2022. (lctjk2) (Entered: 02/26/2022)
05/26/2022	<u>8</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (Valdivia, Diana) (Entered: 05/26/2022)
05/31/2022		MINUTE ORDER: Upon consideration of the <u>8</u> Joint Status Report, it is hereby ORDERED that the parties shall file a further joint status report by August 24, 2022, including, if necessary, a jointly proposed schedule for briefing. Signed by Judge Timothy J. Kelly on 05/31/2022. (lctjk2) (Entered: 05/31/2022)
08/24/2022	<u>9</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (Valdivia, Diana) (Entered: 08/24/2022)
08/25/2022		MINUTE ORDER: Upon consideration of the parties' <u>9</u> Joint Status Report, it is hereby ORDERED that the parties shall file another joint status report by November 22, 2022, including, if necessary, a jointly proposed schedule for briefing. Signed by Judge Timothy J. Kelly on 08/25/2022. (lctjk2) (Entered: 08/25/2022)
11/17/2022	<u>10</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Marsha Wellknown Yee on behalf of All Defendants Substituting for attorney Diana V. Valdivia (Yee, Marsha) (Entered: 11/17/2022)
11/22/2022	<u>11</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (Yee, Marsha) (Entered: 11/22/2022)
11/23/2022		MINUTE ORDER: Upon consideration of the parties' <u>11</u> Joint Status Report, it is hereby ORDERED that the parties shall file another joint status report by February 20, 2023, including, if necessary, a jointly proposed schedule for briefing. Signed by Judge Timothy J. Kelly on 11/23/2022. (lctjk2) (Entered: 11/23/2022)
02/14/2023	<u>12</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (Yee, Marsha) (Entered: 02/14/2023)
02/15/2023		MINUTE ORDER: Upon consideration of the parties' <u>12</u> Joint Status Report, it is hereby ORDERED that the parties shall file another joint status report by May 17, 2023, including, if necessary, a jointly proposed schedule for briefing. Signed by Judge Timothy J. Kelly on 2/15/2023. (lctjk2) (Entered: 02/15/2023)
05/17/2023	<u>13</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (Yee, Marsha) (Entered: 05/17/2023)
05/18/2023		MINUTE ORDER: Upon consideration of the parties' <u>13</u> Joint Status Report, it is hereby ORDERED that the parties shall file another joint status report by August 16, 2023, including, if necessary, a jointly proposed schedule for briefing. Signed by Judge Timothy J. Kelly on 5/18/2023. (lctjk2) (Entered: 05/18/2023)

08/16/2023	<u>14</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (Yee, Marsha) (Entered: 08/16/2023)
08/21/2023		MINUTE ORDER: Upon consideration of the parties' <u>14</u> Joint Status Report, it is hereby ORDERED that the parties shall file another joint status report by November 16, 2023, including, if necessary, a jointly proposed schedule for briefing. Signed by Judge Timothy J. Kelly on 8/21/2023. (lctjk2) (Entered: 08/21/2023)
11/16/2023	<u>15</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Christina O'Tousa on behalf of All Defendants Substituting for attorney Marsha Wellknown Yee (O'Tousa, Christina) (Entered: 11/16/2023)
11/16/2023	<u>16</u>	STATUS REPORT by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (O'Tousa, Christina) (Entered: 11/16/2023)
11/20/2023		MINUTE ORDER: Upon consideration of Defendants' <u>16</u> Status Report, it is hereby ORDERED that Defendants shall confer with Plaintiff to determine whether he has any objections to the representations made in the <u>16</u> Status Report. It is further ORDERED that in the absence of any such objections, the parties shall file a further joint status report by February 14, 2024. Signed by Judge Timothy J. Kelly on 11/20/2023. (lctjk2) (Entered: 11/20/2023)
02/14/2024	<u>17</u>	STATUS REPORT by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (O'Tousa, Christina) (Entered: 02/14/2024)
02/16/2024		MINUTE ORDER: Upon consideration of Defendants' <u>17</u> Status Report, it is hereby ORDERED that Defendants shall confer with Plaintiff to determine whether he has any objections to the representations made in the <u>17</u> Status Report. It is further ORDERED that in the absence of any such objections, the parties shall file a further joint status report by May 14, 2024. Signed by Judge Timothy J. Kelly on 2/16/2024. (lctjk2) (Entered: 02/16/2024)
05/15/2024	<u>18</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (O'Tousa, Christina) (Entered: 05/15/2024)
05/17/2024		MINUTE ORDER: Upon consideration of the parties' <u>18</u> Joint Status Report, it is hereby ORDERED that the parties shall file another joint status report by August 13, 2024, including, if necessary, a jointly proposed schedule for briefing. Signed by Judge Timothy J. Kelly on 5/17/2024. (lctjk2) (Entered: 05/17/2024)
08/13/2024	<u>19</u>	Joint STATUS REPORT by DEPARTMENT OF DEFENSE, UNITED STATES CENTRAL INTELLIGENCE AGENCY, UNITED STATES SOUTHERN COMMAND. (O'Tousa, Christina) (Entered: 08/13/2024)
08/14/2024		MINUTE ORDER: Upon consideration of the parties' <u>19</u> Joint Status Report, it is hereby ORDERED that the parties shall file another joint status report by November 13, 2024, including, if necessary, a jointly proposed schedule for briefing. Signed by Judge Timothy J. Kelly on 8/14/2024. (lctjk2) (Entered: 08/14/2024)