

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:21-cv-03306-TSC**

KAPLAN et al v. CENTRAL INTELLIGENCE AGENCY et al    Date Filed: 12/17/2021  
Assigned to: Judge Tanya S. Chutkan    Jury Demand: None  
Case: 1:22-cv-01604-TSC    Nature of Suit: 895 Freedom of  
Cause: 05:552 Freedom of Information Act    Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff****JONATHAN KAPLAN**

represented by **David A. Schulz**  
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*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Plaintiff****JOHN NAPIER TYE**

represented by **David A. Schulz**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Plaintiff****VALUES UNITED**  
*doing business as*  
**WHISTLEBLOWER AID**

represented by **David A. Schulz**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

V.

**Defendant****CENTRAL INTELLIGENCE  
AGENCY**

represented by **Kenneth A. Adebajo**  
U.S. ATTORNEY'S OFFICE FOR THE  
DISTRICT OF COLUMBIA  
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*ATTORNEY TO BE NOTICED*

**Defendant****NATIONAL  
GEOSPATIAL-INTELLIGENCE  
AGENCY**

represented by **Kenneth A. Adebajo**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Defendant****OFFICE OF THE DIRECTOR OF  
NATIONAL INTELLIGENCE**

represented by **Kenneth A. Adebajo**  
(See above for address)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

| Date Filed | #         | Docket Text   |
|------------|-----------|---|
| 12/17/2021 | <u>1</u>  | COMPLAINT against CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE ( Filing fee \$ 402 receipt number ADCDC-8938353) filed by JONATHAN KAPLAN, VALUES UNITED D/B/A WHISTLEBLOWER AID, JOHN NAPIER TYE. (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, # <u>6</u> Exhibit F, # <u>7</u> Exhibit G, # <u>8</u> Exhibit H, # <u>9</u> Exhibit I, # <u>10</u> Exhibit J, # <u>11</u> Civil Cover Sheet, # <u>12</u> Summons, # <u>13</u> Summons, # <u>14</u> Summons)(Schulz, David) (Entered: 12/17/2021) |
| 12/17/2021 | <u>2</u>  | LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by VALUES UNITED D/B/A WHISTLEBLOWER AID (Schulz, David) (Entered: 12/17/2021)  |
| 12/21/2021 |           | Case Assigned to Judge Tanya S. Chutkan. (zsb) (Entered: 12/21/2021)  |
| 12/21/2021 |           | NOTICE OF ERROR re <u>1</u> Complaint; emailed to schulzd@ballardspahr.com, cc'd 4 associated attorneys -- The PDF file you docketed contained errors: 1. Missing summonses--government. When naming a government agent or agency as a defendant, you must supply a summons for each defendant & two additional summonses for the U.S. Attorney & U.S. Attorney General. Please submit using the event Request for Summons to Issue. (zsb, ) (Entered: 12/21/2021)  |
| 12/21/2021 | <u>3</u>  | SUMMONS (3) Issued Electronically as to CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Attachments: # <u>1</u> Notice and Consent)(adh, ) (Entered: 12/21/2021)  |
| 12/21/2021 | <u>4</u>  | REQUEST FOR SUMMONS TO ISSUE re <u>1</u> Complaint,, filed by JONATHAN KAPLAN, VALUES UNITED, JOHN NAPIER TYE. Related document: <u>1</u> Complaint,, filed by VALUES UNITED, JOHN NAPIER TYE, JONATHAN KAPLAN.(Schulz, David) (Entered: 12/21/2021)  |
| 12/29/2021 | <u>5</u>  | SUMMONS (2) Issued Electronically as to U.S. Attorney and U.S. Attorney General (znmw) (Entered: 12/29/2021)  |
| 01/03/2022 | <u>6</u>  | NOTICE of Appearance by Kenneth A. Adebonojo on behalf of CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE (Adebonojo, Kenneth) (Entered: 01/03/2022)  |
| 01/25/2022 | <u>7</u>  | RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. CENTRAL INTELLIGENCE AGENCY served on 12/29/2021 (Schulz, David) (Entered: 01/25/2022)   |
| 01/25/2022 | <u>8</u>  | RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY served on 12/29/2021 (Schulz, David) (Entered: 01/25/2022)   |
| 01/25/2022 | <u>9</u>  | RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 1/10/2022. (Schulz, David) (Entered: 01/25/2022)   |
| 01/25/2022 | <u>10</u> | RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 1/10/2022. Answer due for ALL FEDERAL DEFENDANTS by 2/9/2022. (Schulz, David) (Entered: 01/25/2022)  |
| 01/27/2022 | <u>11</u> | RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE served on 1/27/2022 (Schulz, David) (Entered: 01/27/2022)  |
| 02/09/2022 | <u>12</u> | Consent MOTION for Extension of Time to <i>File Defendants' Answer or Other Response to Plaintiffs' Complaint</i> by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 02/09/2022)  |

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|            |           | 02/09/2022)  |
| 02/10/2022 |           | MINUTE ORDER: Granting Consent <u>12</u> Motion for Extension of Deadlines. Defendants shall answer or otherwise respond to Complaint by March 9, 2022. Signed by Judge Tanya S. Chutkan on 2/10/22. (DJS) (Entered: 02/10/2022)   |
| 02/11/2022 |           | Set/Reset Deadlines: Answer due by 3/9/2022. (tb) (Entered: 02/11/2022)  |
| 03/09/2022 | <u>13</u> | Consent MOTION for Extension of Time to <i>File Defendants' Answer or Other Response to Plaintiffs' Complaint</i> by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 03/09/2022)   |
| 03/15/2022 |           | MINUTE ORDER granting <u>13</u> Motion for Extension of Deadlines. Defendants shall answer or otherwise respond to Plaintiff's Complaint by March 31, 2022. Signed by Judge Tanya S. Chutkan on 3/15/2022. (lcac) (Entered: 03/15/2022)  |
| 03/15/2022 |           | Set/Reset Deadlines: Answer due by 3/31/2022. (tb) (Entered: 03/15/2022)   |
| 03/31/2022 | <u>14</u> | Consent MOTION for Extension of Time to <i>File Defendants' Answer or Other Response to Plaintiffs' Complaint</i> by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 03/31/2022)   |
| 04/07/2022 |           | MINUTE ORDER: Granting <u>14</u> Consent Motion for Extension of Deadlines. Defendants shall answer or otherwise respond to the Complaint by April 8, 2022. Signed by Judge Tanya S. Chutkan on 4/7/22. (DJS) (Entered: 04/07/2022)  |
| 04/08/2022 | <u>15</u> | ANSWER to Complaint by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE.(Adebonojo, Kenneth) (Entered: 04/08/2022)  |
| 04/29/2022 |           | MINUTE ORDER: Before the Court in this FOIA case are a complaint and an answer. The requirements of LCvR 16.3 and Rule 26(f) of the Federal Rules of Civil procedure appear to be inapplicable. IT IS HEREBY ORDERED that the parties shall meet and confer and propose a schedule for proceeding in this matter. The schedule shall address the status of Plaintiffs' FOIA request, the anticipated number of documents responsive to Plaintiffs' FOIA request, the anticipated date(s) for release of the documents requested by Plaintiffs, whether a motion for an Open America stay is likely in this case, whether a Vaughn index will be required in this case, whether and when either party anticipates filing a dispositive motion, and any other pertinent issues. The parties shall file a joint status report that addresses these issues no later than 6/13/22. The joint status report shall be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 4/29/22. (DJS) (Entered: 04/29/2022) |
| 05/02/2022 |           | Set/Reset Deadlines: Joint Status Report due by 6/13/2022. (tb) (Entered: 05/02/2022)  |
| 06/13/2022 | <u>16</u> | Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 06/13/2022)   |
| 07/22/2022 |           | MINUTE ORDER: Having considered the parties' joint status report it is hereby ordered that the parties shall file another joint report by August 16, 2022 and every 60 days thereafter. To the extent the parties propose a change in to status quo, the report shall be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 7/22/22. (DJS) (Entered: 07/22/2022)   |
| 07/26/2022 |           | Set/Reset Deadlines: Joint Report due by 8/16/2022. (tb) (Entered: 07/26/2022)   |
| 08/16/2022 | <u>17</u> | Consent MOTION for Extension of Time to <i>File the Parties' Joint Status Report</i> by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 08/16/2022)  |
| 08/21/2022 |           | MINUTE ORDER: Having considered the parties' joint status report it is hereby ordered that the parties file another joint report by 8/26/22 and every 30 days thereafter. To the extent the parties propose a change to the status quo, the report shall   |

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|            |           | be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 8/21/22. (DJS) (Entered: 08/21/2022)   |
| 08/23/2022 |           | Set/Reset Deadlines: Joint Report due by 8/26/2022. (tb) (Entered: 08/23/2022)   |
| 08/26/2022 | <u>18</u> | Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 08/26/2022)   |
| 08/29/2022 |           | MINUTE ORDER: Upon consideration of the parties' <u>18</u> Joint Status Report the parties are hereby ORDERED to file a Joint Status Report on or before <b>September 26, 2022</b> and every 60 days thereafter. To the extent the parties propose a change in to status quo, the report shall be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 8/29/2022. (lcac) (Entered: 08/29/2022)   |
| 08/29/2022 |           | Set/Reset Deadlines: Joint Status Report due by 9/26/2022. (tb) (Entered: 08/29/2022)  |
| 09/26/2022 | <u>19</u> | Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 09/26/2022)   |
| 11/18/2022 | <u>20</u> | Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 11/18/2022)   |
| 01/23/2023 | <u>21</u> | Joint STATUS REPORT by JONATHAN KAPLAN, JOHN NAPIER TYE, VALUES UNITED. (Schulz, David) (Entered: 01/23/2023)  |
| 03/24/2023 | <u>22</u> | Joint STATUS REPORT by JONATHAN KAPLAN, JOHN NAPIER TYE, VALUES UNITED. (Schulz, David) (Entered: 03/24/2023)  |
| 05/23/2023 | <u>23</u> | Joint STATUS REPORT by JONATHAN KAPLAN, JOHN NAPIER TYE, VALUES UNITED. (Schulz, David) (Entered: 05/23/2023)  |
| 07/24/2023 | <u>24</u> | Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 07/24/2023)   |
| 09/26/2023 | <u>25</u> | Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 09/26/2023)   |
| 11/27/2023 | <u>26</u> | STATUS REPORT by JONATHAN KAPLAN. (Schulz, David) Modified on 11/29/2023 to correct event (zjm). (Entered: 11/27/2023)   |
| 01/26/2024 | <u>27</u> | Joint STATUS REPORT by JONATHAN KAPLAN. (Schulz, David) (Entered: 01/26/2024)  |
| 03/26/2024 | <u>28</u> | Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 03/26/2024)   |
| 03/27/2024 |           | MINUTE ORDER: Upon consideration of <u>28</u> Joint Status Report, the parties shall file an additional status report on or before April 26, 2024, and every 30 days thereafter, updating the court on the status of the parties' discussions and, if appropriate, proposing a briefing schedule. To the extent the parties request a change in the status quo, the status report shall be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 3/27/24. (lce) (Entered: 03/27/2024) |
| 04/26/2024 | <u>29</u> | Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 04/26/2024)   |
| 04/29/2024 |           | MINUTE ORDER: Upon consideration of <u>29</u> Joint Status Report, the parties shall file a status report on or before June 25, 2024, and every 60 days thereafter, updating the court on the status of the parties' discussions and, if appropriate, proposing a briefing schedule. To the extent the parties request a change in the status quo, the status report shall be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 4/29/24. (lce) (Entered: 04/29/2024)              |

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| 06/26/2024 | <u>30</u> | STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL GEOSPATIAL-INTELLIGENCE AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE. (Adebonojo, Kenneth) (Entered: 06/26/2024) |
| 08/27/2024 | <u>31</u> | Joint STATUS REPORT by JONATHAN KAPLAN, JOHN NAPIER TYE, VALUES UNITED. (Schulz, David) (Entered: 08/27/2024)  |