

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:22-cv-01812-RC**

PROJECT FOR PRIVACY AND SURVEILLANCE
ACCOUNTABILITY, INC. v. NATIONAL SECURITY
AGENCY et al
Assigned to: Judge Rudolph Contreras
Cause: 05:552 Freedom of Information Act

Date Filed: 06/24/2022
Jury Demand: None
Nature of Suit: 895 Freedom of
Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

**PROJECT FOR PRIVACY AND
SURVEILLANCE
ACCOUNTABILITY, INC.**

represented by **Brian J. Field**
SCHAERR JAFFE LLP
1717 K Street, NW
Suite 900
Washington, DC 20006
(202) 787-1060
Fax: (202) 776-0136
Email: bfield@schaerr-jaffe.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Gene C. Schaerr
SCHAERR JAFFE LLP
1717 K Street NW, Suite 900
Washington, DC 20006
(202) 787-1060
Fax: (202) 776-0136
Email: gschaerr@schaerr-jaffe.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

NATIONAL SECURITY AGENCY

represented by **Alexander Schreiber**
DOJ-USAO
601 D Street NW
Washington, DC 20530
202-252-6754
Email: alexander.schreiber@usdoj.gov
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Daniel Alan Schiffer
DOJ-CIV
U.S. Department of Justice
601 D Street NW
Washington, DC 20530
(202) 252-2525
Email: daniel.a.schiffer@usdoj.gov
TERMINATED: 08/01/2023
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Robert Aaron Caplen
DOJ-USAO
601 D Street, NW
Washington, DC 20530
(202) 252-2523
Email: rcaplen@gmail.com

TERMINATED: 02/10/2023

Defendant

**CENTRAL INTELLIGENCE
AGENCY**

represented by **Alexander Schreiber**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Daniel Alan Schiffer
(See above for address)
TERMINATED: 08/01/2023
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Robert Aaron Caplen
(See above for address)
TERMINATED: 02/10/2023

Defendant

**UNITED STATES DEPARTMENT OF
JUSTICE**

represented by **Alexander Schreiber**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Daniel Alan Schiffer
(See above for address)
TERMINATED: 08/01/2023
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Robert Aaron Caplen
(See above for address)
TERMINATED: 02/10/2023

Defendant

**OFFICE OF THE DIRECTOR OF
NATIONAL INTELLIGENCE**

represented by **Alexander Schreiber**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Daniel Alan Schiffer
(See above for address)
TERMINATED: 08/01/2023
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Robert Aaron Caplen
(See above for address)
TERMINATED: 02/10/2023

Date Filed	#	Docket Text
06/24/2022	<u>1</u>	COMPLAINT against All Defendants (Filing fee \$ 402 receipt number ADCDC-9329985) filed by PROJECT FOR PRIVACY AND SURVEILLANCE ACCOUNTABILITY, INC.. (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> Exhibit K, # <u>12</u> Exhibit L, # <u>13</u> Exhibit M, # <u>14</u> Exhibit N, # <u>15</u> Exhibit O, # <u>16</u> Exhibit P, # <u>17</u> Exhibit Q, # <u>18</u> Exhibit R, # <u>19</u> Civil Cover Sheet, # <u>20</u> Summons National Security Agency, # <u>21</u> Summons Central Intelligence Agency, # <u>22</u> Summons United States Department of Justice, # <u>23</u> Summons Office of the Director of National Intelligence, # <u>24</u> Summons United States Attorney for D.C., # <u>25</u> Summons United States Attorney General)(Schaerr, Gene C.) Modified on

		6/27/2022 to edit attorney information (znm). (Entered: 06/24/2022)
06/24/2022	<u>2</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by PROJECT FOR PRIVACY AND SURVEILLANCE ACCOUNTABILITY, INC. (Schaerr, Gene C.) Modified on 6/27/2022 to edit attorney information (znm). (Entered: 06/24/2022)
06/27/2022		Case Assigned to Judge Rudolph Contreras. (znm) (Entered: 06/27/2022)
06/27/2022	<u>3</u>	SUMMONS (6) Issued Electronically as to All Defendants, U.S. Attorney and U.S. Attorney General (Attachment: # <u>1</u> Notice and Consent)(znm) (Entered: 06/27/2022)
07/14/2022	<u>4</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 7/1/2022. Answer due for ALL FEDERAL DEFENDANTS by 7/31/2022. (Goodwin, Scott) (Entered: 07/14/2022)
07/14/2022	<u>5</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 7/5/2022. (Goodwin, Scott) (Entered: 07/14/2022)
07/14/2022	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. NATIONAL SECURITY AGENCY served on 7/6/2022 (Goodwin, Scott) (Entered: 07/14/2022)
07/14/2022	<u>7</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. CENTRAL INTELLIGENCE AGENCY served on 7/6/2022 (Goodwin, Scott) (Entered: 07/14/2022)
07/14/2022	<u>8</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. UNITED STATES DEPARTMENT OF JUSTICE served on 7/5/2022 (Goodwin, Scott) (Entered: 07/14/2022)
07/14/2022	<u>9</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE served on 7/5/2022 (Goodwin, Scott) (Entered: 07/14/2022)
07/26/2022	<u>10</u>	NOTICE of Appearance by Robert Aaron Caplen on behalf of All Defendants (Caplen, Robert) (Entered: 07/26/2022)
07/26/2022	<u>11</u>	Unopposed MOTION for Extension of Time to File Answer re <u>1</u> Complaint,, by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Text of Proposed Order)(Caplen, Robert) (Entered: 07/26/2022)
07/27/2022		MINUTE ORDER granting <u>11</u> Unopposed Motion for Extension of Time: It is hereby ORDERED that Defendants shall file a responsive pleading on or before September 9, 2022. Signed by Judge Rudolph Contreras on 07/27/2022. (lrc1) (Entered: 07/27/2022)
09/09/2022	<u>12</u>	ANSWER to Complaint by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Exhibit)(Caplen, Robert) (Entered: 09/09/2022)
09/12/2022		MINUTE ORDER: It is hereby ORDERED that the parties shall meet, confer, and jointly submit a proposed briefing schedule on or before September 26, 2022. SO ORDERED. Signed by Judge Rudolph Contreras on 9/12/2022. (lrc1) (Entered: 09/12/2022)
09/26/2022	<u>13</u>	Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Caplen, Robert) (Entered: 09/26/2022)
09/26/2022		MINUTE ORDER: Upon consideration of <u>13</u> the parties' joint status report, it is hereby ORDERED that the parties shall file another joint status report on or before October 11, 2022. SO ORDERED. Signed by Judge Rudolph Contreras on

		09/26/2022. (lcrc1) (Entered: 09/26/2022)
10/11/2022	<u>14</u>	Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Caplen, Robert) (Entered: 10/11/2022)
10/12/2022		MINUTE ORDER: Upon consideration of <u>14</u> the parties' joint status report, it is hereby ORDERED that the parties shall file another joint status report on or before November 1, 2022. SO ORDERED. Signed by Judge Rudolph Contreras on 10/12/2022. (lcrc1) (Entered: 10/12/2022)
10/12/2022	<u>15</u>	NOTICE of Appearance by Brian J. Field on behalf of PROJECT FOR PRIVACY AND SURVEILLANCE ACCOUNTABILITY, INC. (Field, Brian) (Entered: 10/12/2022)
11/01/2022	<u>16</u>	Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Caplen, Robert) (Entered: 11/01/2022)
11/01/2022		MINUTE ORDER: Upon consideration of <u>16</u> the parties' joint status report, it is hereby ORDERED that the parties shall file another joint status report on or before December 2, 2022. SO ORDERED. Signed by Judge Rudolph Contreras on 11/1/2022. (lcrc1) (Entered: 11/01/2022)
12/02/2022	<u>17</u>	Joint STATUS REPORT by PROJECT FOR PRIVACY AND SURVEILLANCE ACCOUNTABILITY, INC.. (Schaerr, Gene) (Entered: 12/02/2022)
12/05/2022		MINUTE ORDER: Upon consideration of <u>17</u> the parties' joint status report, it is hereby ORDERED that the parties shall file another joint status report on or before January 20, 2023. SO ORDERED. Signed by Judge Rudolph Contreras on 12/5/2022. (lcrc1) (Entered: 12/05/2022)
01/18/2023	<u>18</u>	Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Caplen, Robert) (Entered: 01/18/2023)
01/19/2023		MINUTE ORDER: Upon consideration of <u>18</u> the parties' joint status report, it is hereby ORDERED that the parties shall file another joint status report on or before February 24, 2023. SO ORDERED. Signed by Judge Rudolph Contreras on 1/19/2023. (lcrc1) (Entered: 01/19/2023)
02/10/2023	<u>19</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Daniel Alan Schiffer on behalf of CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE Substituting for attorney Robert A. Caplen (Schiffer, Daniel) (Entered: 02/10/2023)
02/24/2023	<u>20</u>	Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Schiffer, Daniel) (Entered: 02/24/2023)
02/24/2023		MINUTE ORDER: Upon consideration of <u>20</u> the parties' joint status report, it is hereby ORDERED that the parties shall file another joint status report on or before March 24, 2023. SO ORDERED. Signed by Judge Rudolph Contreras on 2/24/2023. (lcrc1) (Entered: 02/24/2023)
03/08/2023		Set/Reset Deadlines: Status Report due by 3/24/2023 (tj) (Entered: 03/08/2023)
03/23/2023	<u>21</u>	Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Schiffer, Daniel) (Entered: 03/23/2023)

03/24/2023		MINUTE ORDER: Upon consideration of <u>21</u> the parties' joint status report, it is hereby ORDERED that the parties shall file another joint status report on or before April 11, 2023. SO ORDERED. Signed by Judge Rudolph Contreras on 3/24/2023. (lrcr1) (Entered: 03/24/2023)
04/10/2023	<u>22</u>	Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Schiffer, Daniel) (Entered: 04/10/2023)
04/11/2023		MINUTE ORDER adopting <u>22</u> the parties' proposed briefing schedule: It is hereby ORDERED that the following schedule shall govern further proceedings: Plaintiff shall file its amended complaint on or before April 17, 2023; Defendants shall file their motion for summary judgment on or before June 9, 2023; Plaintiff shall file its opposition and cross-motion for summary judgment on or before July 21, 2023; Defendants shall file their combined reply and opposition to Plaintiff's cross-motion for summary judgment on or before August 24, 2023; and Plaintiff shall file its reply on or before September 21, 2023. SO ORDERED. Signed by Judge Rudolph Contreras on 4/11/2023. (lrcr1) (Entered: 04/11/2023)
04/17/2023	<u>23</u>	AMENDED COMPLAINT against CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE filed by PROJECT FOR PRIVACY AND SURVEILLANCE ACCOUNTABILITY, INC.. (Attachments: # <u>1</u> Exhibit S, # <u>2</u> Exhibit T, # <u>3</u> Exhibit U, # <u>4</u> Exhibit V, # <u>5</u> Exhibit W, # <u>6</u> Redlined Amended Complaint)(Schaerr, Gene) (Entered: 04/17/2023)
04/30/2023	<u>24</u>	ANSWER to <u>23</u> Amended Complaint, by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE.(Schiffer, Daniel) (Entered: 04/30/2023)
05/23/2023		Set/Reset Deadlines: Cross Motions due by 7/21/2023. Response to Cross Motions due by 8/24/2023. Reply to Cross Motions due by 9/21/2023. Summary Judgment motions due by 6/9/2023. Response to Motion for Summary Judgment due by 7/21/2023. Reply to Motion for Summary Judgment due by 8/24/2023. (tj) (Entered: 05/23/2023)
06/02/2023	<u>25</u>	Consent MOTION for Extension of Time to <i>Brief Summary Judgment</i> by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Schiffer, Daniel) (Entered: 06/02/2023)
06/02/2023		MINUTE ORDER granting <u>25</u> Consent Motion for Extension of Summary Judgment Briefing Schedule: It is hereby ORDERED that the following schedule shall govern further proceedings: Defendants' motion for summary judgment shall be filed on or before June 23, 2023; Plaintiff's opposition and cross-motion for summary judgment shall be filed on or before August 4, 2023; Defendants' combined reply in support of their motion for summary judgment and opposition to Plaintiff's cross-motion for summary judgment shall be filed on or before August 31, 2023; and Plaintiff's reply shall be filed on or before September 28, 2023. SO ORDERED. Signed by Judge Rudolph Contreras on 6/2/2023. (lrcr1) (Entered: 06/02/2023)
06/23/2023	<u>26</u>	MOTION for Summary Judgment by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Declaration of Linda M. Kiyosaki, # <u>2</u> Declaration of Vanna Blaine, # <u>3</u> Declaration of Gregory M. Koch, # <u>4</u> Declaration of Michael G. Seidel, # <u>5</u> Declaration of Jonathan M. Breyan, # <u>6</u> Declaration of Kevin G. Tiernan, # <u>7</u> Statement of Facts)(Schiffer, Daniel) (Entered: 06/23/2023)
08/01/2023	<u>27</u>	NOTICE OF WITHDRAWAL OF APPEARANCE as to CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. Attorney Daniel Alan Schiffer terminated. (Schiffer, Daniel) (Entered: 08/01/2023)

08/03/2023	<u>28</u>	NOTICE of Appearance by Alexander Schreiber on behalf of All Defendants (Schreiber, Alexander) (Entered: 08/03/2023)
08/04/2023	<u>29</u>	Cross MOTION for Summary Judgment by PROJECT FOR PRIVACY AND SURVEILLANCE ACCOUNTABILITY, INC.. (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Statement of Facts, # <u>3</u> Exhibit 1: Huebner Email, # <u>4</u> Exhibit 2: ODNI White Paper, # <u>5</u> Exhibit 3: Cymru Contract, # <u>6</u> Exhibit 4: ODNI Report, # <u>7</u> Exhibit 5: Duke Report, # <u>8</u> Text of Proposed Order)(Schaerr, Gene) (Entered: 08/04/2023)
08/04/2023	<u>30</u>	RESPONSE re <u>26</u> MOTION for Summary Judgment filed by PROJECT FOR PRIVACY AND SURVEILLANCE ACCOUNTABILITY, INC.. (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Statement of Facts, # <u>3</u> Exhibit 1: Huebner Email, # <u>4</u> Exhibit 2: ODNI White Paper, # <u>5</u> Exhibit 3: Cymru Contract, # <u>6</u> Exhibit 4: ODNI Report, # <u>7</u> Exhibit 5: Duke Report, # <u>8</u> Text of Proposed Order)(Schaerr, Gene) (Entered: 08/04/2023)
08/31/2023	<u>31</u>	RESPONSE re <u>29</u> Cross MOTION for Summary Judgment filed by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Statement of Facts, # <u>2</u> Text of Proposed Order)(Schreiber, Alexander) (Entered: 08/31/2023)
08/31/2023	<u>32</u>	REPLY to opposition to motion re <u>29</u> Cross MOTION for Summary Judgment <i>ECF No. 30</i> filed by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Statement of Facts, # <u>2</u> Text of Proposed Order)(Schreiber, Alexander) (Entered: 08/31/2023)
09/26/2023	<u>33</u>	Consent MOTION for Extension of Time to File Response/Reply as to <u>29</u> Cross MOTION for Summary Judgment by PROJECT FOR PRIVACY AND SURVEILLANCE ACCOUNTABILITY, INC.. (Attachments: # <u>1</u> Text of Proposed Order)(Schaerr, Gene) (Entered: 09/26/2023)
09/27/2023		MINUTE ORDER granting <u>33</u> Plaintiff's Consent Motion for Extension of Time: It is hereby ORDERED that Plaintiff shall file its reply in support of its cross-motion for summary judgment on or before October 19, 2023. SO ORDERED. Signed by Judge Rudolph Contreras on 9/27/2023. (lcrc1) (Entered: 09/27/2023)
09/28/2023		Set/Reset Deadlines: Reply to Cross Motions due by 10/19/2023. (tj) (Entered: 09/28/2023)
10/17/2023	<u>34</u>	Consent MOTION for Extension of Time to File Response/Reply as to <u>29</u> Cross MOTION for Summary Judgment by PROJECT FOR PRIVACY AND SURVEILLANCE ACCOUNTABILITY, INC.. (Attachments: # <u>1</u> Text of Proposed Order)(Schaerr, Gene) (Entered: 10/17/2023)
10/17/2023		MINUTE ORDER granting <u>34</u> Plaintiff's Consent Motion for Extension of Time: It is hereby ORDERED that Plaintiff shall file its reply in support of its cross-motion for summary judgment on or before November 9, 2023. SO ORDERED. Signed by Judge Rudolph Contreras on 10/17/2023. (lcrc1) (Entered: 10/17/2023)
10/18/2023		Set/Reset Deadlines: Reply to Cross Motions due by 11/9/2023. (tj) (Entered: 10/18/2023)
11/07/2023	<u>35</u>	Consent MOTION for Extension of Time to File Response/Reply as to <u>29</u> Cross MOTION for Summary Judgment by PROJECT FOR PRIVACY AND SURVEILLANCE ACCOUNTABILITY, INC.. (Attachments: # <u>1</u> Text of Proposed Order)(Schaerr, Gene) (Entered: 11/07/2023)
11/07/2023		MINUTE ORDER granting <u>35</u> Plaintiff's Consent Motion for Extension of Time: It is hereby ORDERED that Plaintiff shall file its reply in support of its cross-motion for summary judgment on or before November 16, 2023. SO ORDERED. Signed by Judge Rudolph Contreras on 11/7/2023. (lcrc1) (Entered: 11/07/2023)
11/16/2023	<u>36</u>	REPLY to opposition to motion re <u>29</u> Cross MOTION for Summary Judgment filed by PROJECT FOR PRIVACY AND SURVEILLANCE ACCOUNTABILITY, INC.. (Field, Brian) (Entered: 11/16/2023)

01/05/2024	<u>37</u>	ORDER granting in part and denying in part <u>26</u> Defendants' Motion for Summary Judgment; and denying <u>29</u> Plaintiff's Cross-Motion for Summary Judgment. See document for details. Signed by Judge Rudolph Contreras on 1/5/2024. (lcrc1) (Entered: 01/05/2024)
01/05/2024	<u>38</u>	MEMORANDUM OPINION granting in part and denying in part <u>26</u> Defendants' Motion for Summary Judgment; and denying <u>29</u> Plaintiff's Cross-Motion for Summary Judgment. See document for details. Signed by Judge Rudolph Contreras on 1/5/2024. (lcrc1) (Entered: 01/05/2024)
01/18/2024	<u>39</u>	Consent MOTION for Extension of Time to <i>File a Proposed Schedule for Further Proceedings</i> by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Text of Proposed Order)(Schreiber, Alexander) (Entered: 01/18/2024)
01/18/2024		MINUTE ORDER granting <u>39</u> Defendants' Consent Motion for Extension of Time: It is hereby ORDERED that the parties shall file a proposed schedule for further proceedings on or before February 2, 2024. SO ORDERED. Signed by Judge Rudolph Contreras on 1/18/2024. (lcrc1) (Entered: 01/18/2024)
02/01/2024	<u>40</u>	Consent MOTION for Extension of Time to <i>File a Proposed Schedule for Further Proceedings</i> by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Text of Proposed Order)(Schreiber, Alexander) (Entered: 02/01/2024)
02/01/2024		MINUTE ORDER granting <u>40</u> Defendants' Consent Motion for Extension of Time: It is hereby ORDERED that the parties shall file a proposed schedule for further proceedings on or before March 4, 2024. SO ORDERED. Signed by Judge Rudolph Contreras on 2/1/2024. (lcrc1) (Entered: 02/01/2024)
03/04/2024	<u>41</u>	Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Text of Proposed Order)(Schreiber, Alexander) (Entered: 03/04/2024)
03/05/2024		MINUTE ORDER: Upon consideration of <u>41</u> the parties' joint status report, it is hereby ORDERED that the parties shall file another joint status report on or before March 15, 2024. SO ORDERED. Signed by Judge Rudolph Contreras on 3/5/2024. (lcrc1) (Entered: 03/05/2024)
03/15/2024	<u>42</u>	Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Text of Proposed Order)(Schreiber, Alexander) (Entered: 03/15/2024)
03/15/2024		MINUTE ORDER: Upon consideration of <u>42</u> the parties' joint status report, it is hereby ORDERED that the parties shall file another joint status report on or before March 29, 2024. SO ORDERED. Signed by Judge Rudolph Contreras on 3/15/2024. (lcrc1) (Entered: 03/15/2024)
03/29/2024	<u>43</u>	Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Text of Proposed Order Plaintiff, # <u>2</u> Text of Proposed Order Defendant)(Schreiber, Alexander) (Entered: 03/29/2024)
04/02/2024		MINUTE ORDER: Upon consideration of <u>43</u> the parties' Joint Status Report, it is hereby ORDERED that the parties shall submit another Joint Status Report no later than May 1, 2024, to apprise the Court of the status of this case. During this period, the parties are to further discuss and attempt to reach agreement on the following search issues: whether Defendants need only search for external communications; and, whether the only responsive documents are those that expressly mention the names listed in the underlying request. In an attempt to reach agreement, Defendants must explain to Plaintiff why they believe the searches proposed are reasonably calculated to locate responsive records. These search issues cannot be put off until the filing of summary judgment motions practice. If the parties cannot reach agreement, the parties

		are to set forth their respective positions in the joint status report for the court to decide. SO ORDERED. Signed by Judge Rudolph Contreras on 4/2/2024. (lcrc1) (Entered: 04/02/2024)
04/30/2024	<u>44</u>	MOTION for Extension of Time to <i>Comply With the Court's Order</i> by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Schreiber, Alexander) (Entered: 04/30/2024)
04/30/2024		MINUTE ORDER granting <u>44</u> Defendants' Motion for Extension of Time to Comply with the Court's Order: It is hereby ORDERED that the parties shall comply with the Court's April 2, 2024 Minute Order on or before May 31, 2024. It is FURTHER ORDERED that the parties shall file a joint status report on or before that date. SO ORDERED. Signed by Judge Rudolph Contreras on 4/30/2024. (lcrc1) (Entered: 04/30/2024)
05/31/2024	<u>45</u>	MOTION to Stay <i>All Proceedings And Extension Of Time</i> by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Exhibit 1 – Pl. Br., # <u>2</u> Exhibit 2 – Gov. Br., # <u>3</u> Text of Proposed Order)(Schreiber, Alexander) (Entered: 05/31/2024)
06/06/2024	<u>46</u>	RESPONSE re <u>45</u> MOTION to Stay <i>All Proceedings And Extension Of Time</i> filed by PROJECT FOR PRIVACY AND SURVEILLANCE ACCOUNTABILITY, INC.. (Attachments: # <u>1</u> Text of Proposed Order)(Schaerr, Gene) (Entered: 06/06/2024)
06/13/2024	<u>47</u>	Consent MOTION for Extension of Time to File Response/Reply by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Text of Proposed Order)(Schreiber, Alexander) (Entered: 06/13/2024)
06/13/2024		MINUTE ORDER granting <u>47</u> Defendants' Consent Motion for Two–Business–Day Extension of Time: It is hereby ORDERED that Defendants shall file their reply to Plaintiff's opposition to Defendants' motion to stay on or before June 17, 2024. SO ORDERED. Signed by Judge Rudolph Contreras on 6/13/2024. (lcrc1) (Entered: 06/13/2024)
06/17/2024	<u>48</u>	REPLY to opposition to motion re <u>45</u> MOTION to Stay <i>All Proceedings And Extension Of Time</i> filed by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Schreiber, Alexander) (Entered: 06/17/2024)
07/18/2024		MINUTE ORDER denying <u>45</u> Defendants' Motion to Stay All Proceedings: It is hereby ORDERED that Defendants' Motion to Stay All Proceedings is DENIED. It is FURTHER ORDERED that, on or before August 1, 2024, the parties shall comply with the Court's April 2, 2024 Minute Order. It is FURTHER ORDERED that the parties shall file a joint status report on or before that date. SO ORDERED. Signed by Judge Rudolph Contreras on 7/18/2024. (lcrc1) (Entered: 07/18/2024)
08/01/2024	<u>49</u>	Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Text of Proposed Order)(Schreiber, Alexander) (Entered: 08/01/2024)
08/02/2024		MINUTE ORDER: Upon consideration of <u>49</u> the parties' joint status report, it is hereby ORDERED that the parties shall file another joint status report on or before August 22, 2024. It is FURTHER ORDERED that Plaintiff shall respond to Defendants' search proposal on or before August 8, 2024; and that Defendants shall provide a final response to Plaintiff on or before August 15, 2024. SO ORDERED. Signed by Judge Rudolph Contreras on 8/2/2024. (lcrc1) (Entered: 08/02/2024)
08/22/2024	<u>50</u>	Joint STATUS REPORT by CENTRAL INTELLIGENCE AGENCY, NATIONAL SECURITY AGENCY, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Exhibit 1 – Defs' July 31 Letter, # <u>2</u> Exhibit 2 – Pl. Aug. 8 Response, # <u>3</u> Exhibit 3 –

