

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:23-cv-02469-LLA**

TOTAL ASSET RECOVERY SERVICES LLC v. UNITED STATES DEPARTMENT OF COMMERCE
Assigned to: Judge Loren L. AliKhan
Cause: 05:552 Freedom of Information Act

Date Filed: 08/24/2023
Jury Demand: None
Nature of Suit: 895 Freedom of Information Act
Jurisdiction: Federal Question

Plaintiff

TOTAL ASSET RECOVERY SERVICES LLC

represented by **Geng Chen**
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V.

Defendant

UNITED STATES DEPARTMENT OF COMMERCE

represented by **John Bardo**
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Date Filed	#	Docket Text
08/24/2023	<u>1</u>	COMPLAINT against UNITED STATES DEPARTMENT OF COMMERCE (Filing fee \$ 402 receipt number ADCDC-10301133) filed by TOTAL ASSET RECOVERY SERVICES LLC. (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> Civil Cover Sheet, # <u>7</u> Summons)(Savage, Zachary) (Entered: 08/24/2023)
08/28/2023		NOTICE OF ERROR re <u>1</u> Complaint; emailed to ZSavage@susmangodfrey.com, cc'd 1 associated attorneys -- The PDF file you docketed contained errors: 1. Noncompliance with LCvR 5.1(c). Please file an errata correcting the initiating pleading to include the name & full residence address of each party using the event Errata., 2. 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., 3. COMPLIANCE DEADLINE is by close of business today. This case will not proceed any further until all errors

		are satisfied. (zsl,) (Entered: 08/28/2023)
08/28/2023	<u>2</u>	ERRATA by TOTAL ASSET RECOVERY SERVICES LLC re <u>1</u> Complaint,. (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> Civil Cover Sheet)(Savage, Zachary) (Entered: 08/28/2023)
08/28/2023	<u>3</u>	REQUEST FOR SUMMONS TO ISSUE <i>U.S. Department of Commerce</i> filed by TOTAL ASSET RECOVERY SERVICES LLC. Related document: <u>1</u> Complaint, filed by TOTAL ASSET RECOVERY SERVICES LLC. (Attachments: # <u>1</u> Summons U.S. Attorney General, # <u>2</u> Summons U.S. Attorney's Office, Washington D.C.)(Savage, Zachary) (Entered: 08/28/2023)
08/28/2023		Case Assigned to Judge Christopher R. Cooper. (zsl) (Entered: 08/28/2023)
08/30/2023	<u>4</u>	SUMMONS (3) Issued Electronically as to UNITED STATES DEPARTMENT OF COMMERCE, U.S. Attorney and U.S. Attorney General (Attachment: # <u>1</u> Notice and Consent)(zsl) (Entered: 08/30/2023)
09/29/2023	<u>5</u>	Consent MOTION for Extension of Time to <i>Respond to Complaint</i> by UNITED STATES DEPARTMENT OF COMMERCE. (Attachments: # <u>1</u> Text of Proposed Order)(Bardo, John) (Entered: 09/29/2023)
10/02/2023		MINUTE ORDER granting <u>5</u> Defendant's Motion for Extension of Time. Defendant shall answer or otherwise respond to the complaint by November 1, 2023. Signed by Judge Christopher R. Cooper on 10/2/2023. (lccrc2) (Entered: 10/02/2023)
10/13/2023	<u>6</u>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name– Geng Chen, Filing fee \$ 100, receipt number ADCDC–10418575. Fee Status: Fee Paid. by TOTAL ASSET RECOVERY SERVICES LLC. (Attachments: # <u>1</u> Declaration in support of Motion for Admission Pro Hac Vice with Certificate of Good Standing, # <u>2</u> Text of Proposed Order)(Savage, Zachary) (Entered: 10/13/2023)
10/16/2023		MINUTE ORDER granting <u>6</u> Plaintiff's Motion for Leave to Appear Pro Hac Vice. Counsel should register for e-filing via PACER and file a notice of appearance pursuant to LCvR 83.6(a). Click for instructions. Signed by Judge Christopher R. Cooper on 10/16/2023. (lccrc2) (Entered: 10/16/2023)
11/01/2023	<u>7</u>	ANSWER to Complaint by UNITED STATES DEPARTMENT OF COMMERCE. (Attachments: # <u>1</u> Exhibit Exhibit 1, # <u>2</u> Exhibit Exhibit 2, # <u>3</u> Exhibit Exhibit 3)(Bardo, John) (Entered: 11/01/2023)
11/01/2023		MINUTE ORDER: Before the Court in this FOIA case are a complaint and an answer. It is hereby ORDERED that the parties promptly confer and file a joint proposed schedule for briefing or disclosure by November 15, 2023. Signed by Judge Christopher R. Cooper on 11/1/2023. (lccrc2) (Entered: 11/01/2023)
11/01/2023	<u>8</u>	ANSWER to Complaint (<i>Amended</i>) by UNITED STATES DEPARTMENT OF COMMERCE. (Attachments: # <u>1</u> Exhibit Redline Edits to ECF No. 7)(Bardo, John) (Entered: 11/01/2023)
11/15/2023	<u>9</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF COMMERCE. (Bardo, John) (Entered: 11/15/2023)
11/16/2023	<u>10</u>	NOTICE of Appearance by Geng Chen on behalf of TOTAL ASSET RECOVERY SERVICES LLC (Chen, Geng) (Entered: 11/16/2023)
11/17/2023		MINUTE ORDER: In light of the parties' <u>9</u> Joint Status Report, the parties shall file a further status report on or by December 15, 2023. Signed by Judge Christopher R. Cooper on 11/17/2023. (lccrc2) (Entered: 11/17/2023)
12/14/2023		Case directly reassigned to Judge Loren L. AliKhan. Judge Christopher R. Cooper is no longer assigned to the case. (rj) (Entered: 12/14/2023)
12/15/2023	<u>11</u>	Joint STATUS REPORT by TOTAL ASSET RECOVERY SERVICES LLC. (Attachments: # <u>1</u> Exhibit 1)(Chen, Geng) (Entered: 12/15/2023)
12/21/2023		MINUTE ORDER: Upon consideration of the parties' joint status report, Dkt. <u>11</u> , it is hereby ORDERED that the parties shall file a joint status report on or before February 23, 2024. Signed by Judge Loren L. AliKhan on 12/21/2023. (lc1la3) (Entered: 12/21/2023)

		12/21/2023)
12/22/2023		Set/Reset Deadlines/Hearings: Joint Status Report due by 2/23/2024. (zcdw) (Entered: 12/22/2023)
02/23/2024	<u>12</u>	Joint STATUS REPORT by TOTAL ASSET RECOVERY SERVICES LLC. (Chen, Geng) (Entered: 02/23/2024)
02/26/2024		MINUTE ORDER: Upon consideration of the parties' joint status report <u>12</u> , it is hereby ORDERED that the parties shall file a joint status report on or before April 1, 2024. Signed by Judge Loren L. AliKhan on 02/26/2024. (lc1a3) (Entered: 02/26/2024)
02/27/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 4/1/2024. (zcdw) (Entered: 02/27/2024)
03/27/2024	<u>13</u>	NOTICE of Change of Address by Zachary Savage (Savage, Zachary) (Entered: 03/27/2024)
03/27/2024	<u>14</u>	NOTICE of Change of Address by Geng Chen (Chen, Geng) (Entered: 03/27/2024)
04/01/2024	<u>15</u>	Joint STATUS REPORT by TOTAL ASSET RECOVERY SERVICES LLC. (Chen, Geng) (Entered: 04/01/2024)
04/01/2024		MINUTE ORDER: Upon consideration of the parties' joint status report <u>15</u> , it is hereby ORDERED that the parties shall file a joint status report on or before May 1, 2024. Signed by Judge Loren L. AliKhan on 04/01/2024. (lc1a3) (Entered: 04/01/2024)
04/04/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 5/1/2024. (zcdw) (Entered: 04/04/2024)
05/01/2024	<u>16</u>	Joint STATUS REPORT by TOTAL ASSET RECOVERY SERVICES LLC. (Chen, Geng) (Entered: 05/01/2024)
05/01/2024		MINUTE ORDER: Upon consideration of the parties' joint status report <u>16</u> , it is hereby ORDERED that the parties shall file a joint status report on or before June 3, 2024. Signed by Judge Loren L. AliKhan on 05/01/2024. (lc1a3) (Entered: 05/01/2024)
05/03/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 6/3/2024. (zcdw) (Entered: 05/03/2024)
06/03/2024	<u>17</u>	Joint STATUS REPORT by TOTAL ASSET RECOVERY SERVICES LLC. (Chen, Geng) (Entered: 06/03/2024)
06/04/2024		MINUTE ORDER: Upon consideration of the parties' joint status report <u>17</u> , it is hereby ORDERED that the parties shall file a joint status report on or before July 2, 2024. Signed by Judge Loren L. AliKhan on 06/04/2024. (lc1a3) (Entered: 06/04/2024)
06/05/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 7/2/2024. (zcdw) (Entered: 06/05/2024)
07/02/2024	<u>18</u>	Joint STATUS REPORT by TOTAL ASSET RECOVERY SERVICES LLC. (Chen, Geng) (Entered: 07/02/2024)
07/03/2024		MINUTE ORDER: Upon consideration of the parties' joint status report <u>18</u> , it is hereby ORDERED that the parties shall file a joint status report on or before August 2, 2024. Signed by Judge Loren L. AliKhan on 07/03/2024. (lc1a3) (Entered: 07/03/2024)
07/03/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 8/2/2024. (zcdw) (Entered: 07/03/2024)
08/02/2024	<u>19</u>	Joint STATUS REPORT by TOTAL ASSET RECOVERY SERVICES LLC. (Chen, Geng) (Entered: 08/02/2024)
08/05/2024		MINUTE ORDER: Upon consideration of the parties' joint status report <u>19</u> , it is hereby ORDERED that the parties shall file a joint status report on or before

		September 6, 2024. Signed by Judge Loren L. AliKhan on 08/05/2024. (lc1la3) (Entered: 08/05/2024)
08/05/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 9/6/2024. (zcdw) (Entered: 08/05/2024)
09/06/2024	<u>20</u>	Joint STATUS REPORT by TOTAL ASSET RECOVERY SERVICES LLC. (Chen, Geng) (Entered: 09/06/2024)
09/09/2024		MINUTE ORDER: Upon consideration of the parties' joint status report <u>20</u> , it is hereby ORDERED that the parties shall file a joint status report on or before September 20, 2024. Signed by Judge Loren L. AliKhan on 09-09-2024. (lc1la3) (Entered: 09/09/2024)
09/09/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 9/20/2024. (zcdw) (Entered: 09/09/2024)