

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:23-cv-02745-ACR**

FUNCTIONAL GOVERNMENT INITIATIVE v. INTERNAL
REVENUE SERVICE
Assigned to: Judge Ana C. Reyes
Cause: 05:552 Freedom of Information Act

Date Filed: 09/19/2023
Jury Demand: None
Nature of Suit: 895 Freedom of
Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

**FUNCTIONAL GOVERNMENT
INITIATIVE**

represented by **Jeremiah Lee Morgan**
WILLIAM J. OLSON, P.C.
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ATTORNEY TO BE NOTICED

V.

Defendant

INTERNAL REVENUE SERVICE

represented by **Joycelyn S. Peyton**
U.S. DEPARTMENT OF JUSTICE
Ben Franklin Station
P.O. Box 227
Washington, DC 20044
(202) 514-6576
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LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
09/19/2023	<u>1</u>	COMPLAINT against INTERNAL REVENUE SERVICE (Filing fee \$ 402 receipt number ADCDC-10362722) filed by FUNCTIONAL GOVERNMENT INITIATIVE. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Exhibit, # <u>3</u> Summons to the Attorney General, # <u>4</u> Summons to the IRS, # <u>5</u> Summons to U.S. Attorney)(Morgan, Jeremiah) (Entered: 09/19/2023)
09/20/2023		Case Assigned to Judge Ana C. Reyes. (zljn) (Entered: 09/20/2023)
09/20/2023	<u>2</u>	SUMMONS (3) Issued Electronically as to INTERNAL REVENUE SERVICE, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent)(zljn) (Entered: 09/20/2023)
11/08/2023	<u>3</u>	MOTION for Extension of Time to File Answer by INTERNAL REVENUE SERVICE. (Attachments: # <u>1</u> Text of Proposed Order)(Peyton, Joycelyn) (Entered: 11/08/2023)
11/08/2023		MINUTE ORDER granting Defendant's <u>3</u> Motion for Extension of Time to Answer. It is further ORDERED that Defendant shall have until December 11, 2023 to file its Answer or other response to the Complaint. Signed by Judge Ana C. Reyes on 11/8/2023. (lcacr1) (Entered: 11/08/2023)
12/11/2023	<u>4</u>	ANSWER to Complaint by INTERNAL REVENUE SERVICE.(Peyton, Joycelyn) (Entered: 12/11/2023)

12/12/2023		MINUTE ORDER. Plaintiff filed this Freedom of Information Act ("FOIA") action on September 19, 2023. Dkt 1. Defendant filed its Answer on December 11, 2023. Dkt. 4. Cases filed under FOIA are exempt from the requirements of Federal Rule of Civil Procedure 26(f) and Local Civil Rule 16.3. <i>See</i> LCvR 16.3(b)(10). Accordingly, it is hereby ORDERED that the parties shall meet and confer and file a Joint Status Report on or before January 3, 2024. The Joint Status Report should address, among other things: (1) the status of Plaintiff's FOIA request; (2) the anticipated number of documents responsive to Plaintiff's FOIA request; (3) the anticipated date(s) for release of the documents requested by Plaintiff; (4) whether a motion for a stay is likely under <i>Open America v. Watergate Special Prosecution Force</i> , 547 F.2d 605 (D.C. Cir. 1976); and (5) whether the parties anticipate summary judgment briefing and, if so, a proposed briefing schedule. Counsel shall not contact Chambers directly concerning scheduling or other matters, as Chambers personnel will not handle questions relating to the status or scheduling of pending matters, except in case of an emergency. In an emergency, Chambers can be reached at (202) 354-3350. Signed by Judge Ana C. Reyes on 12/12/2023. (lcacr1) (Entered: 12/12/2023)
12/12/2023		Set/Reset Deadlines/Hearings: Joint Status Report due by 1/3/2024. (zcdw) (Entered: 12/12/2023)
01/03/2024	<u>5</u>	Joint STATUS REPORT by INTERNAL REVENUE SERVICE. (Peyton, Joycelyn) (Entered: 01/03/2024)
01/04/2024		MINUTE ORDER directing the parties to file another joint status report on or before February 20, 2024. SO ORDERED. Signed by Judge Ana C. Reyes on 1/4/2024. (lcacr1) (Entered: 01/04/2024)
01/12/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 2/20/2024. (zcdw) (Entered: 01/12/2024)
02/20/2024	<u>6</u>	Joint STATUS REPORT by INTERNAL REVENUE SERVICE. (Peyton, Joycelyn) (Entered: 02/20/2024)
04/05/2024	<u>7</u>	Joint STATUS REPORT by INTERNAL REVENUE SERVICE. (Peyton, Joycelyn) (Entered: 04/05/2024)
05/06/2024	<u>8</u>	Joint STATUS REPORT by INTERNAL REVENUE SERVICE. (Peyton, Joycelyn) (Entered: 05/06/2024)
07/31/2024		MINUTE ORDER directing the parties to file a joint status report on or before August 12, 2024, and every 60 days thereafter. Signed by Judge Ana C. Reyes on 7/31/2024. (lcacr1) (Entered: 07/31/2024)
08/12/2024	<u>9</u>	Joint STATUS REPORT by INTERNAL REVENUE SERVICE. (Peyton, Joycelyn) (Entered: 08/12/2024)
08/13/2024	<u>10</u>	NOTICE of Corporate Status by FUNCTIONAL GOVERNMENT INITIATIVE (Morgan, Jeremiah) (Entered: 08/13/2024)
08/13/2024	<u>11</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by FUNCTIONAL GOVERNMENT INITIATIVE (Morgan, Jeremiah) (Entered: 08/13/2024)