

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:24-cv-00241-ACR**

AMERICAN CENTER FOR LAW AND JUSTICE v.
DEPARTMENT OF STATE
Assigned to: Judge Ana C. Reyes
Cause: 05:552 Freedom of Information Act

Date Filed: 01/26/2024
Jury Demand: None
Nature of Suit: 895 Freedom of
Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

**AMERICAN CENTER FOR LAW
AND JUSTICE**

represented by **John A. Monaghan**
AMERICAN CENTER FOR LAW AND
JUSTICE
1000 Regent University Drive
RH-422
Virginia Beach, VA 23464
(757) 955-8171
Fax: (757) 226-2836
Email: jmonaghan@aclj.org
ATTORNEY TO BE NOTICED

V.

Defendant

DEPARTMENT OF STATE

represented by **Alexander Schreiber**
DOJ-USAO
Civil
601 D Street NW
Washington, DC 20530
202-252-6754
Email: alexander.schreiber@usdoj.gov
TERMINATED: 08/29/2024
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Christina O'Tousa
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Date Filed	#	Docket Text
01/26/2024	<u>1</u>	COMPLAINT against DEPARTMENT OF STATE (Filing fee \$ 405 receipt number ADCDC-10646649) filed by AMERICAN CENTER FOR LAW AND JUSTICE. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Summons US Attorney General, # <u>3</u> Summons Department of State, # <u>4</u> Summons DC AUSA)(Monaghan, John) (Attachment 1 replaced on 1/30/2024) (zcb). (Entered: 01/26/2024)
01/26/2024	<u>2</u>	NOTICE of Appearance by John A. Monaghan on behalf of AMERICAN CENTER FOR LAW AND JUSTICE (Monaghan, John) (Entered: 01/26/2024)
01/26/2024	<u>3</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by AMERICAN CENTER FOR LAW AND JUSTICE (Monaghan, John) (Entered: 01/26/2024)

01/26/2024	<u>4</u>	ERRATA by AMERICAN CENTER FOR LAW AND JUSTICE. (Attachments: # <u>1</u> Errata Complaint, # <u>2</u> Exhibit Exhibit A, # <u>3</u> Exhibit Exhibit B, # <u>4</u> Summons AG Summons, # <u>5</u> Summons DC AUSA, # <u>6</u> Summons Dept of State, # <u>7</u> Errata Notice of Appearance, # <u>8</u> Errata Rule 26.1 Disclosure)(Monaghan, John) (Entered: 01/26/2024)
01/30/2024		Case Assigned to Judge Ana C. Reyes. (zcb) (Entered: 01/30/2024)
01/30/2024	<u>5</u>	SUMMONS (3) Issued Electronically as to DEPARTMENT OF STATE, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent)(zcb) (Entered: 01/30/2024)
02/13/2024	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. DEPARTMENT OF STATE served on 2/7/2024 (Monaghan, John) (Entered: 02/13/2024)
02/13/2024	<u>7</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 2/7/2024. Answer due for ALL FEDERAL DEFENDANTS by 3/8/2024. (Monaghan, John) (Entered: 02/13/2024)
03/05/2024	<u>8</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 2/13/24. (Monaghan, John) (Entered: 03/05/2024)
03/08/2024	<u>9</u>	NOTICE of Appearance by Christina O'Tousa on behalf of DEPARTMENT OF STATE (O'Tousa, Christina) (Entered: 03/08/2024)
03/08/2024	<u>10</u>	Consent MOTION for Extension of Time to File Answer re <u>1</u> Complaint, by DEPARTMENT OF STATE. (Attachments: # <u>1</u> Text of Proposed Order)(O'Tousa, Christina) (Entered: 03/08/2024)
03/18/2024		MINUTE ORDER granting Defendant's <u>10</u> Consent Motion to Extend Time to Respond to the Complaint. It is ORDERED that Defendant shall have until and through March 27, 2024, to answer or otherwise respond to the Complaint. SO ORDERED. Signed by Judge Ana C. Reyes on 3/18/2024 (lcacr1) (Entered: 03/18/2024)
03/24/2024		Set/Reset Deadlines/Hearings: Answer or other response to complaint due by 3/27/2024. (zcdw) (Entered: 03/24/2024)
03/27/2024	<u>11</u>	ANSWER to Complaint by DEPARTMENT OF STATE.(O'Tousa, Christina) (Entered: 03/27/2024)
03/29/2024		MINUTE ORDER. Plaintiff filed this Freedom of Information Act (FOIA) action on January 26, 2024. Dkt 1. Defendant filed its Answer on March 27, 2024. Dkt. 11. Cases filed under FOIA are exempt from the requirements of Federal Rule of Civil Procedure 26(f) and Local Civil Rule 16.3. See 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 April 11, 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 3/29/2024 (lcacr1) (Entered: 03/29/2024)
03/31/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 4/11/2024. (zcdw) (Entered: 03/31/2024)
04/11/2024	<u>12</u>	Joint STATUS REPORT by DEPARTMENT OF STATE. (O'Tousa, Christina) (Entered: 04/11/2024)
06/12/2024		MINUTE ORDER directing the parties to file another joint status report on or before July 10, 2024, and every 60 days thereafter. Signed by Judge Ana C. Reyes on 6/12/2024. (lcacr1) (Entered: 06/12/2024)

06/12/2024		Set/Reset Deadlines/Hearings: Status Report due by 7/10/2024 (zjch,) (Entered: 06/13/2024)
07/11/2024	<u>13</u>	NOTICE of Appearance by Alexander Schreiber on behalf of All Defendants (Schreiber, Alexander) (Entered: 07/11/2024)
07/11/2024	<u>14</u>	Joint STATUS REPORT by DEPARTMENT OF STATE. (Schreiber, Alexander) (Entered: 07/11/2024)
08/29/2024	<u>15</u>	NOTICE OF WITHDRAWAL OF APPEARANCE as to DEPARTMENT OF STATE. Attorney Alexander Schreiber terminated. (O'Tousa, Christina) (Entered: 08/29/2024)
09/09/2024	<u>16</u>	Joint STATUS REPORT by DEPARTMENT OF STATE. (O'Tousa, Christina) (Entered: 09/09/2024)