

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:24-cv-00379-TSC**

AMERICAN PROPERTY LOCATORS, INC. v. UNITED STATES CUSTOMS AND BORDER PROTECTION  
Assigned to: Judge Tanya S. Chutkan  
Cause: 05:552 Freedom of Information Act

Date Filed: 02/08/2024  
Jury Demand: None  
Nature of Suit: 895 Freedom of Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**AMERICAN PROPERTY LOCATORS, INC.**

represented by **C. Peter Sorenson**  
SORENSEN LAW OFFICE  
P.O. Box 10836  
Eugene, OR 97440  
541-606-9173  
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**ATTORNEY TO BE NOTICED**

V.

**Defendant**

**UNITED STATES CUSTOMS AND BORDER PROTECTION**

represented by **Douglas C. Dreier**  
U.S. ATTORNEY'S OFFICE FOR THE DISTRICT OF COLUMBIA  
601 D Street NW  
Washington, DC 20053  
(202) 252-2551  
Email: [douglas.dreier@usdoj.gov](mailto:douglas.dreier@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
02/08/2024	<u>1</u>	COMPLAINT against UNITED STATES CUSTOMS AND BORDER PROTECTION ( Filing fee \$ 405 receipt number ADCDC-10677045) filed by AMERICAN PROPERTY LOCATORS, INC.. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Summons CBP, # <u>3</u> Summons USAG, # <u>4</u> Summons USAO-DC, # <u>5</u> Exhibit 101, # <u>6</u> Exhibit 102, # <u>7</u> Exhibit 103, # <u>8</u> Exhibit 104, # <u>9</u> Exhibit 105, # <u>10</u> Exhibit 106, # <u>11</u> Exhibit 107, # <u>12</u> Exhibit 108)(Sorenson, C.) (Entered: 02/08/2024)
02/12/2024		Case Assigned to Judge Tanya S. Chutkan. (zsl) (Entered: 02/12/2024)
02/12/2024	<u>2</u>	SUMMONS (3) Issued Electronically as to UNITED STATES CUSTOMS AND BORDER PROTECTION, U.S. Attorney and U.S. Attorney General (Attachment: # <u>1</u> Notice and Consent)(zsl) (Entered: 02/12/2024)
02/27/2024	<u>3</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 2/15/2024., RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. UNITED STATES CUSTOMS AND BORDER PROTECTION served on 2/14/2024, RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 2/12/2024. ( Answer due for ALL FEDERAL DEFENDANTS by 3/13/2024.) (Sorenson, C.) (Entered: 02/27/2024)
03/11/2024	<u>4</u>	NOTICE of Appearance by Douglas C. Dreier on behalf of UNITED STATES CUSTOMS AND BORDER PROTECTION (Dreier, Douglas) (Entered: 03/11/2024)
03/11/2024	<u>5</u>	Consent MOTION for Extension of Time to <i>File Response to Plaintiff's Complaint</i> by UNITED STATES CUSTOMS AND BORDER PROTECTION. (Attachments: # <u>1</u> Text of Proposed Order)(Dreier, Douglas) (Entered: 03/11/2024)

03/11/2024		MINUTE ORDER: Granting Defendant's <u>5</u> Consent Motion for Extension. Defendant's Response to Plaintiff's Complaint due by April 12, 2024. Signed by Judge Tanya S. Chutkan on 03/11/2024. (lcd) (Entered: 03/11/2024)
03/11/2024		Set/Reset Deadlines: Answer due by 4/12/2024 (lsj) (Entered: 03/11/2024)
04/12/2024	<u>6</u>	MOTION to Dismiss , MOTION for Summary Judgment by UNITED STATES CUSTOMS AND BORDER PROTECTION. (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Statement of Facts, # <u>3</u> Exhibit Index, # <u>4</u> Declaration of Patrick A. Howard, # <u>5</u> Exhibit A, # <u>6</u> Exhibit B, # <u>7</u> Exhibit C, # <u>8</u> Exhibit D, # <u>9</u> Exhibit E, # <u>10</u> Exhibit F, # <u>11</u> Exhibit G, # <u>12</u> Exhibit H, # <u>13</u> Text of Proposed Order)(Dreier, Douglas) (Entered: 04/12/2024)
04/18/2024	<u>7</u>	Consent MOTION for Extension of Time to File <i>Opposition</i> by AMERICAN PROPERTY LOCATORS, INC.. (Attachments: # <u>1</u> Text of Proposed Order)(Sorenson, C.) (Entered: 04/18/2024)
04/18/2024		MINUTE ORDER: Granting Plaintiff's <u>7</u> Consent Motion for Extension. The court sets the following deadlines: Plaintiff's Opposition to Defendant's Motion to Dismiss or, in the Alternative, for Summary Judgment due July 10, 2024; Defendant's Reply to Plaintiff's Opposition due August 9, 2024. Signed by Judge Tanya S. Chutkan on 04/18/2024. (lcd) (Entered: 04/18/2024)
05/07/2024		Set/Reset Deadlines: Responses due by 7/10/2024. Replies due by 8/9/2024. (zed) (Entered: 05/07/2024)
07/03/2024	<u>8</u>	Memorandum in opposition to re <u>6</u> Motion to Dismiss,, Motion for Summary Judgment, filed by AMERICAN PROPERTY LOCATORS, INC.. (Attachments: # <u>1</u> Text of Proposed Order, # <u>2</u> Declaration Leppke, # <u>3</u> Statement of Facts, # <u>4</u> Memorandum in Support)(Sorenson, C.) (Entered: 07/03/2024)
08/08/2024	<u>9</u>	REPLY to opposition to motion re <u>6</u> MOTION to Dismiss MOTION for Summary Judgment filed by UNITED STATES CUSTOMS AND BORDER PROTECTION. (Attachments: # <u>1</u> Statement of Facts – Response and Reply)(Dreier, Douglas) (Entered: 08/08/2024)