

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:21-cv-03083-TSC**

AMERICAN CENTER FOR LAW AND JUSTICE v. UNITED STATES DEPARTMENT OF STATE et al
Assigned to: Judge Tanya S. Chutkan
Cause: 05:552 Freedom of Information Act

Date Filed: 11/22/2021
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 **Benjamin Paul Sisney**
AMERICAN CENTER FOR LAW & JUSTICE
201 Maryland Avenue NE
Washington, DC 20002
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LEAD ATTORNEY
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V.

Defendant

UNITED STATES DEPARTMENT OF STATE

represented by **Alexander Schreiber**
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TERMINATED: 09/16/2024
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TERMINATED: 07/19/2023
LEAD ATTORNEY
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Defendant

**OFFICE OF THE DIRECTOR OF
NATIONAL INTELLIGENCE**

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

Thomas Duffey
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Thomas Anthony Quinn
(See above for address)
TERMINATED: 07/19/2023
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

**UNITED STATES DEPARTMENT
OF DEFENSE
DEFENSE INTELLIGENCE AGENCY**

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

Thomas Duffey
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Thomas Anthony Quinn
(See above for address)
TERMINATED: 07/19/2023
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

**UNITED STATES CENTRAL
COMMAND**

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

Thomas Duffey
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Thomas Anthony Quinn
(See above for address)
TERMINATED: 07/19/2023
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
11/22/2021	<u>1</u>	COMPLAINT against All Defendants (Filing fee \$ 402 receipt number ADCDC-8883742) filed by AMERICAN CENTER FOR LAW AND JUSTICE.

		(Attachments: # <u>1</u> Exhibit A (Plaintiff's FOIA request letter), # <u>2</u> Exhibit B (FedEx delivery confirmation), # <u>3</u> Exhibit C (Plaintiff email submissions of FOIA request), # <u>4</u> Exhibit D (Def. State Dept. response), # <u>5</u> Exhibit E (Defs. ODNI and USCENTCOM responses), # <u>6</u> Civil Cover Sheet, # <u>7</u> Summons to US Attorney General, # <u>8</u> Summons to US Attorney for DC, # <u>9</u> Summons to Def. US State Dept., # <u>10</u> Summons to Def. ODNI, # <u>11</u> Summons to Def. DIA, # <u>12</u> Summons to Def. USCENTCOM)(Sisney, Benjamin) (Entered: 11/22/2021)
11/22/2021	<u>2</u>	NOTICE of Appearance by Benjamin Paul Sisney on behalf of AMERICAN CENTER FOR LAW AND JUSTICE (Sisney, Benjamin) (Entered: 11/22/2021)
11/22/2021	<u>3</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by AMERICAN CENTER FOR LAW AND JUSTICE (Sisney, Benjamin) (Entered: 11/22/2021)
11/23/2021		Case Assigned to Judge Tanya S. Chutkan. (zsb) (Entered: 11/23/2021)
11/23/2021	<u>4</u>	SUMMONS (4) Issued Electronically as to OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent)(adh,) (Entered: 11/23/2021)
12/15/2021	<u>5</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 12/14/2021. Answer due for ALL FEDERAL DEFENDANTS by 1/13/2022. (Sisney, Benjamin) (Entered: 12/15/2021)
12/15/2021	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. UNITED STATES DEPARTMENT OF STATE served on 12/14/2021 (Sisney, Benjamin) (Entered: 12/15/2021)
12/15/2021	<u>7</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. UNITED STATES DEPARTMENT OF DEFENSE served on 12/13/2021 (Sisney, Benjamin) (Entered: 12/15/2021)
12/16/2021	<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 12/15/2021. (Sisney, Benjamin) (Entered: 12/16/2021)
12/17/2021	<u>9</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. UNITED STATES CENTRAL COMMAND served on 12/15/2021 (Sisney, Benjamin) (Entered: 12/17/2021)
01/12/2022	<u>10</u>	NOTICE of Appearance by Thomas Anthony Quinn on behalf of All Defendants (Quinn, Thomas) (Entered: 01/12/2022)
01/12/2022	<u>11</u>	Unopposed MOTION for Extension of Time to File Answer re <u>1</u> Complaint,, by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Attachments: # <u>1</u> Text of Proposed Order)(Quinn, Thomas) (Entered: 01/12/2022)
01/13/2022		MINUTE ORDER: Granting Consent <u>11</u> Motion for Extension Deadlines. Defendants shall answer or otherwise respond to the Complaint by February 11, 2022. Signed by Judge Tanya S. Chutkan on 1/13/21. (DJS) (Entered: 01/13/2022)
01/14/2022		Set/Reset Deadlines: Answer due by 2/11/2022. (tb) (Entered: 01/14/2022)
02/11/2022	<u>12</u>	ANSWER to Complaint by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE.(Quinn, Thomas) (Entered: 02/11/2022)
02/20/2022		MINUTE ORDER: Before the Court in this FOIA case are a complaint and an answer. The requirements of LCvR 16.3 and Rule 26(f) of the Federal Rules of Civil procedure appear to be inapplicable. IT IS HEREBY ORDERED that the parties shall meet and confer and propose a schedule for proceeding in this matter. The schedule shall address the status of Plaintiff's FOIA request, the anticipated number of documents

		responsive to Plaintiff's FOIA request, the anticipated date(s) for release of the documents requested by Plaintiff, whether a motion for an Open America stay is likely in this case, whether a Vaughn index will be required in this case, whether and when either party anticipates filing a dispositive motion, and any other pertinent issues. The parties shall file a joint status report that addresses these issues no later than 4/4/22. The joint status report shall be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 2/20/22. (DJS) (Entered: 02/20/2022)
02/23/2022		Set/Reset Deadlines: Joint Status Report due by 4/4/2022. (tb) (Entered: 02/23/2022)
04/04/2022	<u>13</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Quinn, Thomas) (Entered: 04/04/2022)
04/28/2022		MINUTE ORDER: Having considered the parties' joint status report, it is hereby ordered that the parties shall file a joint status report by June 3, 2022, and every sixty (60) days thereafter. To the extent the report contains a proposal to change the status quo, the report shall be accompanied by a proposed order. Signed by Judge Tanya S. Chutkan on 4/28/22. (DJS) (Entered: 04/28/2022)
05/02/2022		Set/Reset Deadlines: Joint Status Report due by 6/3/2022. (tb) (Entered: 05/02/2022)
05/27/2022	<u>14</u>	NOTICE of Appearance by John Monaghan on behalf of AMERICAN CENTER FOR LAW AND JUSTICE (Monaghan, John) (Entered: 05/27/2022)
06/03/2022	<u>15</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Quinn, Thomas) (Entered: 06/03/2022)
08/02/2022	<u>16</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Quinn, Thomas) (Entered: 08/02/2022)
10/03/2022	<u>17</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Quinn, Thomas) (Entered: 10/03/2022)
11/02/2022	<u>18</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Quinn, Thomas) (Entered: 11/02/2022)
01/13/2023	<u>19</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Quinn, Thomas) (Entered: 01/13/2023)
03/14/2023	<u>20</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Quinn, Thomas) (Entered: 03/14/2023)
05/11/2023	<u>21</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Quinn, Thomas) (Entered: 05/11/2023)
07/12/2023	<u>22</u>	Joint MOTION for Extension of Time to File <i>To File Joint Status Report</i> by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Truong, John) Modified on 7/13/2023 to correct relief/docket text (zjm). (Entered: 07/12/2023)

07/17/2023		MINUTE ORDER: Granting Plaintiff's <u>22</u> Joint Motion for Extension of Time. The Parties shall file a Joint Status Report by July 19, 2023. Signed by Judge Tanya S. Chutkan on 7/17/23. (lcsr) (Entered: 07/17/2023)
07/19/2023	<u>23</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Alexander Schreiber on behalf of All Defendants Substituting for attorney Thomas Anthony Quinn (Schreiber, Alexander) (Entered: 07/19/2023)
07/19/2023	<u>24</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Schreiber, Alexander) (Entered: 07/19/2023)
09/18/2023	<u>25</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Schreiber, Alexander) (Entered: 09/18/2023)
11/17/2023	<u>26</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Schreiber, Alexander) (Entered: 11/17/2023)
01/16/2024	<u>27</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Schreiber, Alexander) (Entered: 01/16/2024)
03/15/2024	<u>28</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Schreiber, Alexander) (Entered: 03/15/2024)
05/14/2024	<u>29</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Schreiber, Alexander) (Entered: 05/14/2024)
07/15/2024	<u>30</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Schreiber, Alexander) (Entered: 07/15/2024)
09/13/2024	<u>31</u>	Joint STATUS REPORT by OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, UNITED STATES CENTRAL COMMAND, UNITED STATES DEPARTMENT OF DEFENSE, UNITED STATES DEPARTMENT OF STATE. (Duffey, Thomas) (Entered: 09/13/2024)
09/16/2024	<u>32</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Thomas Duffey on behalf of All Defendants Substituting for attorney Alexander Schreiber (Duffey, Thomas) (Entered: 09/16/2024)