

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:22-cv-00092-JMC**

JAMES MADISON PROJECT et al v. DEPARTMENT OF JUSTICE  
Assigned to: Judge Jia M. Cobb  
Cause: 05:552 Freedom of Information Act

Date Filed: 01/13/2022  
Jury Demand: None  
Nature of Suit: 895 Freedom of Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**JAMES MADISON PROJECT**

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**Plaintiff**

**BRIAN J. KAREM**

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V.

**Defendant**

**U.S. DEPARTMENT OF JUSTICE**

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Date Filed	#	Docket Text
01/13/2022	<u>1</u>	COMPLAINT against DEPARTMENT OF JUSTICE ( Filing fee \$ 402 receipt number ADCDC-8978943) filed by THE JAMES MADISON PROJECT, BRIAN J. KAREM. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Exhibit rule 7 cert, # <u>3</u> Summons DOJ, # <u>4</u> Summons USADC, # <u>5</u> Summons USAG)(Moss, Bradley) (Entered: 01/13/2022)
01/13/2022	<u>2</u>	NOTICE of Appearance by Mark Steven Zaid on behalf of All Plaintiffs (Zaid, Mark) (Entered: 01/13/2022)
01/13/2022	<u>3</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by JAMES MADISON PROJECT. (znmng) (Entered: 01/14/2022)
01/14/2022		Case Assigned to Judge Jia M. Cobb. (znmng) (Entered: 01/14/2022)
01/14/2022	<u>4</u>	SUMMONS (3) Issued Electronically as to DEPARTMENT OF JUSTICE, U.S. Attorney and U.S. Attorney General (Attachment: # <u>1</u> Notice and Consent)(znmng) (Entered: 01/14/2022)
01/28/2022	<u>5</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. DEPARTMENT OF JUSTICE served on 1-24-2022 (Attachments: # <u>1</u> Exhibit DOJ receipt)(Moss, Bradley) (Entered: 01/28/2022)
01/28/2022	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 1-24-2022. (Attachments: # <u>1</u> Exhibit USAG receipt)(Moss, Bradley) (Entered: 01/28/2022)
01/28/2022	<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 1/24/2022. Answer due for ALL FEDERAL DEFENDANTS by 2/23/2022. (Attachments: # <u>1</u> Exhibit USADC receipt)(Moss, Bradley) (Entered: 01/28/2022)
02/23/2022	<u>8</u>	ANSWER to Complaint by DEPARTMENT OF JUSTICE.(Scott, Olivia) (Entered: 02/23/2022)
02/24/2022		MINUTE ORDER: The Court ORDERS that the Parties confer and submit a joint proposed schedule for further proceedings, which shall include a proposed schedule for the processing and release of responsive records or for briefing dispositive motions, by March 10, 2022. Signed by Judge Jia M. Cobb on February 24, 2022. (lcjmc2) (Entered: 02/24/2022)
03/10/2022	<u>9</u>	Joint STATUS REPORT <i>and Proposed Schedule</i> by DEPARTMENT OF JUSTICE. (Scott, Olivia) (Entered: 03/10/2022)
03/11/2022		MINUTE ORDER re <u>9</u> Status Report filed by DEPARTMENT OF JUSTICE: The Court has reviewed the Parties' Joint Status Report and directs the Parties to file another joint status report by April 8, 2022. Signed by Judge Jia M. Cobb on March 11, 2022. (lcjmc2) (Entered: 03/11/2022)
04/08/2022	<u>10</u>	Joint STATUS REPORT by DEPARTMENT OF JUSTICE. (Scott, Olivia) (Entered: 04/08/2022)
04/11/2022		MINUTE ORDER re <u>10</u> Status Report filed by DEPARTMENT OF JUSTICE: The Court has reviewed the Parties' Joint Status Report and directs the Parties to file another joint status report by May 9, 2022. Signed by Judge Jia M. Cobb on April 11, 2022. (lcjmc2) (Entered: 04/11/2022)

05/09/2022	<u>11</u>	Joint STATUS REPORT by DEPARTMENT OF JUSTICE. (Scott, Olivia) (Entered: 05/09/2022)
05/10/2022		MINUTE ORDER re <u>11</u> Status Report filed by DEPARTMENT OF JUSTICE: The Court has reviewed the Parties' Joint Status Report and directs the Parties to file another joint status report by May 23, 2022. Signed by Judge Jia M. Cobb on May 10, 2022. (lcjmc2) (Entered: 05/10/2022)
05/23/2022	<u>12</u>	Joint STATUS REPORT by DEPARTMENT OF JUSTICE. (Scott, Olivia) (Entered: 05/23/2022)
05/26/2022		MINUTE ORDER re <u>12</u> Status Report filed by DEPARTMENT OF JUSTICE: The Court has reviewed the Parties' Joint Status Report and directs the Parties to submit another joint status report by June 30, 2022. Signed by Judge Jia M. Cobb on May 26, 2022. (lcjmc2) (Entered: 05/26/2022)
06/30/2022	<u>13</u>	Joint STATUS REPORT by DEPARTMENT OF JUSTICE. (Scott, Olivia) (Entered: 06/30/2022)
07/13/2022		MINUTE ORDER re <u>13</u> Joint Status Report filed by DEPARTMENT OF JUSTICE: The Court has reviewed the Parties' Joint Status Report. The Court ORDERS that Defendant shall complete processing the first batch of non-exempt copies of responsive records by August 22, 2022. With respect to the processing rate, Plaintiffs object to the FBI's request that it be permitted to continue with its proposed schedule and process 500 pages per month. Though the Court understands Plaintiffs' desire for a faster processing rate, Plaintiffs have not presented an alternative proposal for the Court to consider. To the extent that Plaintiffs maintain their request for the Court to order a different processing rate, the Court ORDERS Plaintiffs to include a specific proposal in the next joint status report, including any authority supporting their position. In the interim, the Court ORDERS that Defendant shall process at least 500 pages per month. Finally, the Court ORDERS that the Parties shall file their next joint status report by August 25, 2022, and every 90 days thereafter, until further Order of the Court. Signed by Judge Jia M. Cobb on July 13, 2022. (lcjmc2) (Entered: 07/13/2022)
08/25/2022	<u>14</u>	Joint STATUS REPORT by DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2)(Scott, Olivia) (Entered: 08/25/2022)
08/30/2022		MINUTE ORDER re <u>14</u> Joint Status Report filed by DEPARTMENT OF JUSTICE: The Court has reviewed the Parties' Joint Status Report. The Court denies Plaintiff's request to increase the page-per-month processing rate at this juncture for the reasons stated by Defendant in the status report. As to Plaintiff's concern about the lack of released pages from the first 500 pages reviewed, Plaintiffs may file an additional Status Report to clarify any specific relief they seek at this time, or they may wait until data from future months become available. Signed by Judge Jia M. Cobb on August 30, 2022. (lcjmc1) (Entered: 08/30/2022)
11/23/2022	<u>15</u>	Consent MOTION for Extension of Time to File <i>the Parties' Joint Status Report</i> by US DEPT OF JUSTICE. (Scott, Olivia) (Entered: 11/23/2022)
11/28/2022		MINUTE ORDER re <u>15</u> Consent Motion for Extension of Time to File Joint Status Report: Upon consideration of Defendant's Motion, the Court hereby ORDERS that the Motion is GRANTED. The Parties' Joint Status Report is due on November 30, 2022. Signed by Judge Jia M. Cobb on November 28, 2022. (lcjmc1) (Entered: 11/28/2022)
11/30/2022	<u>16</u>	Joint STATUS REPORT by US DEPT OF JUSTICE. (Scott, Olivia) (Entered: 11/30/2022)
12/13/2022		MINUTE ORDER re <u>16</u> Joint Status Report: The Court ORDERS that a Status Conference will be held via videoconference on January 5, 2023, at 11:00 AM to discuss the issues raised in the Parties' Joint Status Report. The Deputy Clerk will provide the information necessary to access the Conference. Signed by Judge Jia M. Cobb on December 13, 2022. (lcjmc1) (Entered: 12/13/2022)
01/05/2023		Minute Entry for Status Conference held on 1/5/2023 before Judge Jia M. Cobb via Zoom. Minute Order forthcoming via Chambers (Court Reporter Tammy Nestor.) (zgf) (Entered: 01/05/2023)

01/05/2023		MINUTE ORDER re <u>16</u> Joint Status Report: The Government is ORDERED to inquire about the feasibility of identifying the number and names of agencies to which documents were referred. The Government shall include the response in the Parties' next Joint Status Report, and the Government must also provide any reasons they contend this information cannot be provided based on information received in response to its inquiry. Additionally, with regards to the FD-302s, the Government is ORDERED to inquire into the feasibility of determining (1) how many FD-302s are under review, and which pertain to Michael Cohen; (2) whether these documents have been sent to other agencies for referral/consultation, and the date upon which a response is anticipated; and (3) when all non-exempt portions of the FD-302s will be released. Signed by Judge Jia M. Cobb on January 5, 2023. (lcjmc1) (Entered: 01/05/2023)
01/05/2023		MINUTE ORDER: The Government is ORDERED to provide the information mentioned in this Court's previous 1/5/2023 Minute Order via declaration by February 17, 2023. Signed by Judge Jia M. Cobb on January 5, 2023. (lcjmc1) (Entered: 01/05/2023)
02/17/2023	<u>17</u>	NOTICE of Filing Agency Declaration by US DEPT OF JUSTICE re Order,, Order (Attachments: # <u>1</u> Declaration of Joseph E. Bender, Jr.)(Scott, Olivia) (Entered: 02/17/2023)
02/28/2023	<u>18</u>	Joint MOTION for Extension of Time to File <i>the Parties' Joint Status Report</i> by US DEPT OF JUSTICE. (Scott, Olivia) (Entered: 02/28/2023)
03/01/2023	<u>19</u>	ENTERED IN ERROR.....Joint STATUS REPORT by US DEPT OF JUSTICE. (Scott, Olivia) Modified on 3/2/2023; refiled as Docket Entry <u>20</u> (znmw). (Entered: 03/01/2023)
03/01/2023	<u>20</u>	Joint STATUS REPORT by US DEPT OF JUSTICE. (Attachments: # <u>1</u> Exhibit)(Scott, Olivia) (Entered: 03/01/2023)
03/02/2023		MINUTE ORDER granting <u>18</u> Joint Motion for Extension of Time: The Court ORDERS that the Motion is GRANTED. The Parties' Joint Status Report was due March 1, 2023. Signed by Judge Jia M. Cobb on March 2, 2023. (lcjmc1) (Entered: 03/02/2023)
03/13/2023		MINUTE ORDER re <u>20</u> Joint Status Report: The Court finds that Defendant complied with the Minute Order entered by the Court on January 5, 2023. The Parties shall continue to update the Court on the progress of production in the Court's next Status Report due on May 30, 2023. Signed by Judge Jia M. Cobb on March 13, 2023. (lcjmc1) (Entered: 03/13/2023)
05/26/2023	<u>21</u>	Joint MOTION for Extension of Time to <i>File Joint Status Report</i> by JAMES MADISON PROJECT, BRIAN J. KAREM. (Attachments: # <u>1</u> Text of Proposed Order)(Moss, Bradley) (Entered: 05/26/2023)
05/30/2023		MINUTE ORDER granting <u>21</u> Joint Motion for Extension of Time: The Court ORDERS that the Motion is GRANTED. The Parties' next Joint Status Report is due on June 2, 2023. Signed by Judge Jia M. Cobb on May 30, 2023. (lcjmc1) (Entered: 05/30/2023)
06/02/2023	<u>22</u>	Joint STATUS REPORT by US DEPT OF JUSTICE. (Scott, Olivia) (Entered: 06/02/2023)
06/07/2023		MINUTE ORDER: In accordance with the Parties' request in their most recent Joint Status Report, the Parties are ORDERED to submit Joint Status Reports every 60 days. The Parties' next Joint Status Report is due on July 31, 2023. Signed by Judge Jia M. Cobb on June 7, 2023. (lcjmc1) (Entered: 06/07/2023)
07/31/2023	<u>23</u>	Joint STATUS REPORT by US DEPT OF JUSTICE. (Scott, Olivia) (Entered: 07/31/2023)
08/02/2023		MINUTE ORDER re <u>23</u> Joint Status Report: The Court ORDERS the Parties to submit their next Joint Status Report in thirty days on September 1, 2023. If the Parties would like the Court to address any issues at that time, they should clearly identify the specific issues they would like the Court to address and outline the Parties' respective positions. Signed by Judge Jia M. Cobb on August 2, 2023. (lcjmc1) (Entered: 08/02/2023)

		08/02/2023)
09/01/2023	<u>24</u>	Joint STATUS REPORT by US DEPT OF JUSTICE. (Scott, Olivia) (Entered: 09/01/2023)
09/01/2023		MINUTE ORDER re <u>24</u> Joint Status Report: At the request of the Parties, it is hereby ORDERED that the next Joint Status Report shall be due on October 4, 2023, and that subsequent reports shall be filed every 30 days thereafter. Signed by Judge Jia M. Cobb on September 1, 2023. (lcjmc1) (Entered: 09/01/2023)
09/01/2023		Set/Reset Deadlines: Joint Status Report due by 10/4/2023. (zgf) (Entered: 09/11/2023)
10/06/2023	<u>25</u>	Joint STATUS REPORT by US DEPT OF JUSTICE. (Scott, Olivia) (Entered: 10/06/2023)
10/06/2023	<u>26</u>	Consent MOTION for Extension of Time to File <i>the Parties' Joint Status Report, Nunc Pro Tunc</i> , by US DEPT OF JUSTICE. (Scott, Olivia) (Entered: 10/06/2023)
10/06/2023		MINUTE ORDER granting <u>26</u> Consent Motion for an Out-of-Time Extension of the Deadline for the Parties to File a Joint Status Report: It is hereby ORDERED that the Motion is GRANTED. In light of the considerations raised in the Motion, the deadline for the Parties joint status report shall be extended by two-days, <i>nunc pro tunc</i> , to October 6, 2023. Signed by Judge Jia M. Cobb on October 6, 2023. (lcjmc1) (Entered: 10/06/2023)
10/26/2023	<u>27</u>	Consent MOTION for Extension of Time to File <i>the Parties' Joint Status Report</i> by US DEPT OF JUSTICE. (Scott, Olivia) (Entered: 10/26/2023)
10/27/2023		MINUTE ORDER granting <u>27</u> Consent Motion for an Extension of Time for Parties to File a Joint Status Report: It is hereby ORDERED that the Motion is GRANTED. In light of the considerations raised in the Motion, the deadline for the Parties' joint status report shall be November 8, 2023. Signed by Judge Jia M. Cobb on October 27, 2023. (lcjmc1) (Entered: 10/27/2023)
11/08/2023	<u>28</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF JUSTICE. (Snyder, Hilarie) (Entered: 11/08/2023)
12/08/2023	<u>29</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF JUSTICE. (Scott, Olivia) (Entered: 12/08/2023)
01/08/2024	<u>30</u>	Consent MOTION for Extension of Time to File <i>the Parties' Joint Status Report</i> by U.S. DEPARTMENT OF JUSTICE. (Scott, Olivia) (Entered: 01/08/2024)
01/10/2024		MINUTE ORDER granting <u>30</u> Motion for Extension of Time to File: The Court hereby ORDERS that the Motion is GRANTED. The Parties shall have through and including January 10, 2024 to file a joint status report. Signed by Judge Jia M. Cobb on January 10, 2024. (lcjmc1) (Entered: 01/10/2024)
01/10/2024	<u>31</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF JUSTICE. (Scott, Olivia) (Entered: 01/10/2024)
01/22/2024		MINUTE ORDER re <u>31</u> Joint Status Report: The Court has reviewed the Parties' joint status report, and hereby ORDERS that the Parties shall continue to abide by the Court's 9/1/2023 Minute Order and submit a joint status report by February 9, 2024. In the status report, Defendant should provide information about when any outside agencies expect to complete their review and its position on the Court increasing its processing rate for responsive records. It is further ORDERED that the Court shall hold a status conference on February 13, 2024 at 1 P.M. by video teleconference to address Plaintiffs' concerns about delay. The Court will provide all information necessary to access the hearing. Signed by Judge Jia M. Cobb on January 22, 2024. (lcjmc1) (Entered: 01/22/2024)
02/09/2024	<u>32</u>	Consent MOTION for Extension of Time to File <i>the Parties' Joint Status Report</i> by U.S. DEPARTMENT OF JUSTICE. (Scott, Olivia) (Entered: 02/09/2024)
02/12/2024		MINUTE ORDER granting <u>32</u> Consent Motion for an Extension of Time to File a Joint Status Report: Having reviewed the motion, the Court finds good cause for the requested extension and hereby ORDERS that the Parties shall have until February 12,

		2024 to file their next joint status report. Signed by Judge Jia M. Cobb on February 12, 2024. (lcjmc1) (Entered: 02/12/2024)
02/12/2024	<u>33</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF JUSTICE. (Scott, Olivia) (Entered: 02/12/2024)
02/13/2024		Minute Entry for proceedings held before Judge Jia M. Cobb: Status Conference held on 2/13/2024. (Court Reporter Stacy Johns) (zgf) (Entered: 02/13/2024)
03/08/2024	<u>34</u>	Consent MOTION for Extension of Time to File <i>the Parties' Joint Status Report</i> by U.S. DEPARTMENT OF JUSTICE. (Scott, Olivia) (Entered: 03/08/2024)
03/13/2024	<u>35</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF JUSTICE. (Scott, Olivia) (Entered: 03/13/2024)
03/14/2024		MINUTE ORDER granting <u>34</u> Consent Motion for Extension of Time to File: The Court hereby GRANTS the motion and extends the Parties' deadline to file a joint status report to March 13, 2024, <i>nunc pro tunc</i> . Signed by Judge Jia M. Cobb on March 14, 2024. (lcjmc1) (Entered: 03/14/2024)
03/25/2024	<u>36</u>	NOTICE of Filing of Relevant Information by JAMES MADISON PROJECT, BRIAN J. KAREM (Attachments: # <u>1</u> Exhibit 1 – Daily Beast Article, # <u>2</u> Exhibit 2 – Salon Article)(Zaid, Mark) (Entered: 03/25/2024)
04/12/2024	<u>37</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF JUSTICE. (Snyder, Cassandra) (Entered: 04/12/2024)
05/13/2024	<u>38</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF JUSTICE. (Snyder, Cassandra) (Entered: 05/13/2024)
05/13/2024	<u>39</u>	NOTICE of Appearance by Cassandra Snyder on behalf of U.S. DEPARTMENT OF JUSTICE (Snyder, Cassandra) (Entered: 05/13/2024)
06/12/2024	<u>40</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF JUSTICE. (Snyder, Cassandra) (Entered: 06/12/2024)
07/12/2024	<u>41</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF JUSTICE. (Snyder, Cassandra) (Entered: 07/12/2024)
08/14/2024	<u>42</u>	Joint STATUS REPORT by U.S. DEPARTMENT OF JUSTICE. (Snyder, Cassandra) (Entered: 08/14/2024)
09/12/2024	<u>43</u>	Joint MOTION for Extension of Time to File <i>Joint Status Report</i> by U.S. DEPARTMENT OF JUSTICE. (Attachments: # <u>1</u> Exhibit A – Joint Status Report)(Snyder, Cassandra) (Entered: 09/12/2024)
09/17/2024		MINUTE ORDER granting <u>43</u> Joint Motion for Extension of Time to File: Having considered the motion, and for good cause shown, the Court GRANTS the motion. It is further ORDERED that the Parties receive a one-day <i>nunc pro tunc</i> extension until September 12, 2024, for submission of their September 2024 joint status report. The Clerk of Court is directed to docket Exhibit A to the <u>43</u> joint motion as the Parties' joint status report. Signed by Judge Jia M. Cobb on September 17, 2024. (lcjmc1) (Entered: 09/17/2024)