

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:23-cv-02529-LLA**

CENTER FOR WATER SECURITY AND COOPERATION v. U.S. ENVIRONMENTAL PROTECTION AGENCY  
Assigned to: Judge Loren L. AliKhan  
Cause: 05:552 Freedom of Information Act

Date Filed: 08/29/2023  
Jury Demand: None  
Nature of Suit: 895 Freedom of Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**CENTER FOR WATER SECURITY  
AND COOPERATION**

represented by **Henry Visser Melville**  
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Date Filed	#	Docket Text
08/29/2023	<u>1</u>	COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF against U.S. ENVIRONMENTAL PROTECTION AGENCY ( Filing fee \$ 402 receipt number ADCDC–10312691) filed by CENTER FOR WATER SECURITY AND COOPERATION. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Summons)(Savage, Justin) (Entered: 08/29/2023)
08/29/2023	<u>2</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by CENTER FOR WATER SECURITY AND COOPERATION (Savage, Justin) (Entered: 08/29/2023)
08/29/2023	<u>3</u>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name– Maureen M. Crough, Filing fee \$ 100, receipt number ADCDC–10312793. Fee Status: Fee Paid. by CENTER FOR WATER SECURITY AND COOPERATION. (Attachments: # <u>1</u> Declaration, # <u>2</u> Certificate of Good Standing)(Savage, Justin) (Entered: 08/29/2023)
08/29/2023	<u>4</u>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name– Nicholas James Maggipinto, Filing fee \$ 100, receipt number ADCDC–10312803. Fee Status: Fee Paid. by CENTER FOR WATER SECURITY AND COOPERATION. (Attachments: # <u>1</u> Declaration, # <u>2</u> Certificate of Good Standing)(Savage, Justin) (Entered: 08/29/2023)
08/29/2023	<u>5</u>	MOTION for Leave to Appear Pro Hac Vice :Attorney Name– Henry Visser Melville, Filing fee \$ 100, receipt number ADCDC–10312809. Fee Status: Fee Paid. by CENTER FOR WATER SECURITY AND COOPERATION. (Attachments: # <u>1</u> Declaration, # <u>2</u> Certificate of Good Standing)(Savage, Justin) (Entered: 08/29/2023)
08/30/2023		Case Assigned to Judge Amit P. Mehta. (zsl) (Entered: 08/30/2023)
08/30/2023	<u>6</u>	SUMMONS (1) Issued Electronically as to U.S. ENVIRONMENTAL PROTECTION AGENCY. (Attachment: # <u>1</u> Notice and Consent)(zsl) (Entered: 08/30/2023)
08/30/2023		NOTICE OF ERROR re <u>1</u> Complaint; emailed to jsavage@sidley.com, cc'd 3 associated attorneys -- The PDF file you docketed contained errors: 1. Missing summonses–government. When naming a government agent or agency as a defendant, you must supply a summons for each defendant & two additional summonses for the U.S. Attorney & U.S. Attorney General. Please submit using the event Request for Summons to Issue. (zsl, ) (Entered: 08/30/2023)
08/30/2023	<u>7</u>	REQUEST FOR SUMMONS TO ISSUE to US Attorney General and US Attorney for the District of Columbia filed by CENTER FOR WATER SECURITY AND COOPERATION. (Attachments: # <u>1</u> Summons)(Savage, Justin) (Entered: 08/30/2023)
08/30/2023		MINUTE ORDER granting <u>3</u> Motion for Leave to Appear Pro Hac Vice. Attorney Maureen M. Crough is hereby admitted pro hac vice to appear in this matter. <b>Counsel should register for e-filing via PACER and file a notice of appearance pursuant to LCvR 83.6(a). Click for instructions.</b> Signed by Judge Amit P. Mehta on 08/30/2023. (lcapm1) (Entered: 08/30/2023)
08/30/2023		MINUTE ORDER granting <u>4</u> Motion for Leave to Appear Pro Hac Vice. Attorney Nicholas James Maggipinto is hereby admitted pro hac vice to appear in this matter. <b>Counsel should register for e-filing via PACER and file a notice of appearance pursuant to LCvR 83.6(a). Click for instructions.</b> Signed by Judge Amit P. Mehta on 08/30/2023. (lcapm1) (Entered: 08/30/2023)

08/30/2023		MINUTE ORDER granting <u>5</u> Motion for Leave to Appear Pro Hac Vice. Attorney Henry Visser Melville is hereby admitted pro hac vice to appear in this matter. <b>Counsel should register for e-filing via PACER and file a notice of appearance pursuant to LCvR 83.6(a).</b> <a href="#">Click for instructions.</a> Signed by Judge Amit P. Mehta on 08/30/2023. (lcapm1) (Entered: 08/30/2023)
08/31/2023	<u>8</u>	SUMMONS (2) Issued Electronically as to U.S. Attorney and U.S. Attorney General. (zed) (Entered: 08/31/2023)
09/06/2023	<u>9</u>	NOTICE of Appearance by Maureen M. Crough on behalf of CENTER FOR WATER SECURITY AND COOPERATION (Crough, Maureen) (Entered: 09/06/2023)
09/06/2023	<u>10</u>	NOTICE of Appearance by Henry Visser Melville on behalf of CENTER FOR WATER SECURITY AND COOPERATION (Melville, Henry) (Entered: 09/06/2023)
09/06/2023	<u>11</u>	NOTICE of Appearance by Nicholas James Maggipinto on behalf of CENTER FOR WATER SECURITY AND COOPERATION (Maggipinto, Nicholas) (Entered: 09/06/2023)
09/20/2023	<u>12</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. U.S. ENVIRONMENTAL PROTECTION AGENCY served on 9/20/2023 (Crough, Maureen) (Entered: 09/20/2023)
09/20/2023	<u>13</u>	ENTERED IN ERROR.....RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the District of Columbia Attorney General. Date of Service Upon District of Columbia Attorney General 9/6/2023. Answer due for ALL D.C. DEFENDANTS by 9/27/2023. (Crough, Maureen) Modified on 9/21/2023 (zed). (Entered: 09/20/2023)
09/21/2023		NOTICE OF ERROR regarding <u>13</u> Summons Returned Executed as to DC Attorney General,. The following error(s) need correction: Incorrect event. Please refile. (zed) (Entered: 09/21/2023)
09/22/2023	<u>14</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 9/6/2023. Answer due for ALL FEDERAL DEFENDANTS by 10/6/2023. (Crough, Maureen) (Entered: 09/22/2023)
10/06/2023	<u>15</u>	ANSWER to Complaint by U.S. ENVIRONMENTAL PROTECTION AGENCY.(Simon, Jeremy) (Entered: 10/06/2023)
10/10/2023	<u>16</u>	ORDER. The parties shall meet and confer and file a Joint Status Report on or before October 24, 2023. See the attached Order for additional details. Signed by Judge Amit P. Mehta on 10/10/2023. (lcapm1) (Entered: 10/10/2023)
10/10/2023	<u>17</u>	AFFIDAVIT of Mailing Summons and Complaint on United States Attorney General. (Crough, Maureen) Modified event on 10/12/2023 (mg). (Entered: 10/10/2023)
10/24/2023	<u>18</u>	NOTICE of Appearance by Laura Craig on behalf of CENTER FOR WATER SECURITY AND COOPERATION (Craig, Laura) (Entered: 10/24/2023)
10/24/2023	<u>19</u>	Joint STATUS REPORT by U.S. ENVIRONMENTAL PROTECTION AGENCY. (Simon, Jeremy) (Entered: 10/24/2023)
10/24/2023	<u>20</u>	Amended STATUS REPORT by CENTER FOR WATER SECURITY AND COOPERATION. (Craig, Laura) (Entered: 10/24/2023)
11/06/2023		MINUTE ORDER. The parties shall file an additional Joint Status Report on or before November 29, 2023, which updates the court on the processing and production of responsive records. The court deems it unnecessary to set a deadline for the supplemental search, and it is premature to set a summary judgment briefing schedule. Signed by Judge Amit P. Mehta on 11/6/2023. (lcapm1) (Entered: 11/06/2023)
11/29/2023	<u>21</u>	Joint STATUS REPORT by U.S. ENVIRONMENTAL PROTECTION AGENCY. (Simon, Jeremy) (Entered: 11/29/2023)
12/01/2023		MINUTE ORDER. The parties shall file an additional Joint Status Report by February 1, 2024, updating the court on the processing and production of responsive records. Defendant shall process potentially responsive records at a rate of 500 documents per month. The court may impose a firm deadline on production if Defendant fails to meet

		the monthly processing rate. A summary judgment schedule is premature at this juncture. Signed by Judge Amit P. Mehta on 12/01/2023. (lcapm1) (Entered: 12/01/2023)
12/01/2023	<u>22</u>	NOTICE OF WITHDRAWAL OF APPEARANCE as to CENTER FOR WATER SECURITY AND COOPERATION. Attorney Nicholas James Maggipinto terminated. (Maggipinto, Nicholas) (Entered: 12/01/2023)
12/18/2023		Case directly reassigned to Judge Loren L. Alikhan. Judge Amit P. Mehta is no longer assigned to the case. (rj) (Entered: 12/18/2023)
02/01/2024	<u>23</u>	Joint STATUS REPORT by U.S. ENVIRONMENTAL PROTECTION AGENCY. (Simon, Jeremy) (Entered: 02/01/2024)
02/02/2024		MINUTE ORDER: In light of the parties' joint status report <u>23</u> , it is ORDERED that the parties shall file a joint status report on or before April 1, 2024, updating the court on the processing and production of responsive records. As the court made clear in its December 1, 2023 minute order, the court may impose a firm deadline on production if Defendant fails to meet the monthly processing rate of 500 per month. Signed by Judge Loren L. AliKhan on 02/02/2024. (lc1la3) (Entered: 02/02/2024)
02/02/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 4/1/2024. (zcdw) (Entered: 02/02/2024)
04/01/2024	<u>24</u>	Joint STATUS REPORT by U.S. ENVIRONMENTAL PROTECTION AGENCY. (Simon, Jeremy) (Entered: 04/01/2024)
04/02/2024		MINUTE ORDER: In light of the parties' joint status report <u>24</u> , it is ORDERED that the parties shall file a joint status report on or before June 6, 2024, updating the court on the processing and production of responsive records. If Defendant has completed its production by that time, as it anticipates it will, the parties should set a date to meet and confer to narrow any areas of dispute and propose a schedule to govern summary judgment briefing. Signed by Judge Loren L. AliKhan on 04/02/2024. (lc1la3) (Entered: 04/02/2024)
04/02/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 6/6/2024. (zcdw) (Entered: 04/02/2024)
05/03/2024	<u>25</u>	NOTICE OF WITHDRAWAL OF APPEARANCE as to CENTER FOR WATER SECURITY AND COOPERATION. Attorney Laura Craig terminated. (Craig, Laura) (Entered: 05/03/2024)
06/06/2024	<u>26</u>	Joint STATUS REPORT by U.S. ENVIRONMENTAL PROTECTION AGENCY. (Simon, Jeremy) (Entered: 06/06/2024)
06/10/2024		MINUTE ORDER: Upon consideration of the parties' joint status report <u>26</u> , it is hereby ORDERED that the parties shall file a joint status report proposing a schedule for summary judgment briefing on or before July 17, 2024. Signed by Judge Loren L. AliKhan on 06/10/2024. (lc1la3) (Entered: 06/10/2024)
07/17/2024	<u>27</u>	Joint STATUS REPORT by U.S. ENVIRONMENTAL PROTECTION AGENCY. (Simon, Jeremy) (Entered: 07/17/2024)
07/18/2024		MINUTE ORDER: Upon consideration of the parties' joint status report <u>27</u> , it is hereby ORDERED that the parties shall file another joint status report on or before August 23, 2024. Unless the parties propose an alternative course of action in that report, the following schedule shall govern summary judgment briefing in this case: (1) Defendant shall file a motion for summary judgment on or before October 22, 2024; (2) Plaintiff shall file its cross-motion for summary judgment on or before November 22, 2024; (3) Defendant shall file a reply and opposition, if any, on or before December 19, 2024; (4) Plaintiff shall file a reply, if any, on or before January 17, 2025. Signed by Judge Loren L. AliKhan on 07/18/2024. (lc1la3) (Entered: 07/18/2024)
08/22/2024	<u>28</u>	Joint STATUS REPORT by U.S. ENVIRONMENTAL PROTECTION AGENCY. (Simon, Jeremy) (Entered: 08/22/2024)

08/23/2024		MINUTE ORDER: In light of the parties' joint status report <u>28</u> , it is hereby ORDERED that the parties shall file another joint status report on or before September 17, 2024. It is further ORDERED that the following schedule shall govern summary judgment briefing in this case: (1) Defendant shall file a motion for summary judgment on or before November 14, 2024; (2) Plaintiff shall file its opposition and cross-motion for summary judgment on or before December 17, 2024; (3) Defendant shall file its reply, if any, and opposition to Plaintiff's motion on or before January 15, 2025; (4) Plaintiff shall file a reply, if any, on or before February 5, 2025. Signed by Judge Loren L. AliKhan on 08/23/2024. (lc11a3) (Entered: 08/23/2024)
08/26/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 9/17/2024. Defendant's Summary Judgment motion due by 11/14/2024. Response to Motion for Summary Judgment due by 12/17/2024. Reply to Motion for Summary Judgment due by 1/15/2025. Plaintiff's Cross Motion due by 12/17/2024. Response to Cross Motion due by 1/15/2025. Reply to Cross Motion due by 2/5/2025. (zcdw) (Entered: 08/26/2024)
09/17/2024	<u>29</u>	Joint STATUS REPORT by U.S. ENVIRONMENTAL PROTECTION AGENCY. (Simon, Jeremy) (Entered: 09/17/2024)
09/17/2024		MINUTE ORDER: Upon consideration of the parties' Joint Status Report <u>29</u> , it is hereby ORDERED that the following schedule shall govern summary judgment briefing in this case: (1) Defendant shall file a motion for summary judgment on or before December 9, 2024; (2) Plaintiff shall file its opposition and cross-motion for summary judgment on or before January 10, 2025; (3) Defendant shall file a reply and opposition on or before February 10, 2025; and (4) Plaintiff shall file a reply on or before March 3, 2025. It is further ORDERED that the parties shall submit a joint status report on or before October 10, 2024, updating the court on the status of the proceedings. Signed by Judge Loren L. AliKhan on 09/17/2024. (lc11a3) (Entered: 09/17/2024)
09/18/2024		Set/Reset Deadlines/Hearings: Joint Status Report due by 10/10/2024. Defendant's Summary Judgment motion due by 12/9/2024. Response to Motion for Summary Judgment due by 1/10/2025. Reply to Motion for Summary Judgment due by 2/10/2025. Plaintiff's Cross Motion due by 1/10/2025. Response to Cross Motion due by 2/10/2025. Reply to Cross Motion due by 3/3/2025. (zcdw) (Entered: 09/18/2024)