

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:23-cv-03669-RCL**

BROWN v. U.S. CITIZENSHIP AND IMMIGRATION SERVICES  
Assigned to: Judge Royce C. Lamberth  
Cause: 05:552 Freedom of Information Act

Date Filed: 12/08/2023  
Jury Demand: None  
Nature of Suit: 895 Freedom of Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff****STEVEN A. BROWN**

represented by **Bradley Bruce Banias**  
BANIAS LAW LLC  
602 Rutledge Avenue  
Charleston, SC 29403  
843-352-4272  
Email: [brad@baniaslaw.com](mailto:brad@baniaslaw.com)  
**ATTORNEY TO BE NOTICED**

V.

**Defendant****U.S. CITIZENSHIP AND IMMIGRATION SERVICES**

represented by **Christina O'Tousa**  
DOJ-USAO  
601 D Street NW  
Washington, DC 20530  
(202) 252-2437  
Email: [christina.o'tousa@usdoj.gov](mailto:christina.o'tousa@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
12/08/2023	<u>1</u>	COMPLAINT against U.S. CITIZENSHIP AND IMMIGRATION SERVICES ( Filing fee \$ 405 receipt number ADCDC-10547211) filed by STEVEN A. BROWN. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Exhibit A, # <u>3</u> Exhibit B, # <u>4</u> Exhibit C, # <u>5</u> Summons As to USAG, # <u>6</u> Summons As to USCIS, # <u>7</u> Summons As to USAO)(Banias, Bradley) (Entered: 12/08/2023)
12/11/2023		Case Assigned to Judge Royce C. Lamberth. (zsl) (Entered: 12/11/2023)
12/12/2023	<u>2</u>	SUMMONS (3) Issued Electronically as to U.S. CITIZENSHIP AND IMMIGRATION SERVICES, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Notice and Consent)(zljn) (Entered: 12/12/2023)
01/08/2024	<u>3</u>	NOTICE of Appearance by Christina O'Tousa on behalf of U.S. CITIZENSHIP AND IMMIGRATION SERVICES (O'Tousa, Christina) (Entered: 01/08/2024)
01/08/2024	<u>4</u>	Consent MOTION for Extension of Time to File Answer re <u>1</u> Complaint, by U.S. CITIZENSHIP AND IMMIGRATION SERVICES. (O'Tousa, Christina) (Entered: 01/08/2024)
01/09/2024	<u>5</u>	ORDER granting Consent Motion <u>4</u> for Extension of Time to Answer re Complaint <u>1</u> : It is hereby ORDERED that the motion is GRANTED. Defendant shall have until 02/28/2024 to respond to the Complaint. Signed by Judge Royce C. Lamberth on 01/09/2024. (lcrcl3) (Entered: 01/09/2024)
02/28/2024	<u>6</u>	Partial MOTION to Dismiss by U.S. CITIZENSHIP AND IMMIGRATION SERVICES. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2, # <u>3</u> Text of Proposed Order)(O'Tousa, Christina) (Entered: 02/29/2024)

03/08/2024	<u>7</u>	AMENDED COMPLAINT against U.S. CITIZENSHIP AND IMMIGRATION SERVICES filed by STEVEN A. BROWN.(Banias, Bradley) (Entered: 03/08/2024)
03/22/2024	<u>8</u>	Partial MOTION to Dismiss <i>First Amended Complaint</i> by U.S. CITIZENSHIP AND IMMIGRATION SERVICES. (Attachments: # <u>1</u> Exhibit 1, Oct. 26, 2023 FOIA Request, # <u>2</u> Exhibit 2, Oct. 31, 2023 FOIA Request, # <u>3</u> Exhibit 3, Acknowledgment Letter for Oct. 26, 2023 FOIA Request, # <u>4</u> Exhibit 4, Acknowledgment Letter for Oct. 31, 2023 FOIA Request, # <u>5</u> Exhibit 5, Mar. 22, 2024 USCIS Letter, # <u>6</u> Exhibit 6, Heritage Found. v. Dept of Just. Slip Opinion (Issued Mar. 5, 2024), # <u>7</u> Text of Proposed Order)(O'Tousa, Christina) (Entered: 03/22/2024)
04/05/2024	<u>9</u>	RESPONSE re <u>8</u> Partial MOTION to Dismiss <i>First Amended Complaint</i> filed by STEVEN A. BROWN. (Banias, Bradley) (Entered: 04/05/2024)
04/10/2024	<u>10</u>	Consent MOTION for Extension of Time to File Response/Reply as to <u>8</u> Partial MOTION to Dismiss <i>First Amended Complaint</i> by U.S. CITIZENSHIP AND IMMIGRATION SERVICES. (O'Tousa, Christina) (Entered: 04/10/2024)
04/11/2024	<u>11</u>	ORDER granting Motion <u>10</u> for Extension of Time to File Reply. Defendant Reply due by 04/24/2024. Signed by Judge Royce C. Lamberth on 04/11/2024. (lcrcl1) (Entered: 04/11/2024)
04/24/2024	<u>12</u>	REPLY to opposition to motion re <u>8</u> Partial MOTION to Dismiss <i>First Amended Complaint</i> filed by U.S. CITIZENSHIP AND IMMIGRATION SERVICES. (O'Tousa, Christina) (Entered: 04/24/2024)
05/23/2024	<u>13</u>	NOTICE of Agency Inaction by STEVEN A. BROWN re <u>9</u> Response to motion (Attachments: # <u>1</u> Exhibit A)(Banias, Bradley) (Entered: 05/23/2024)
06/07/2024	<u>14</u>	RESPONSE re <u>13</u> Notice (Other) filed by U.S. CITIZENSHIP AND IMMIGRATION SERVICES. (O'Tousa, Christina) (Entered: 06/07/2024)
09/20/2024	<u>15</u>	MEMORANDUM OPINION. Signed by Judge Royce C. Lamberth on 09/20/2024. (lcrcl3) (Entered: 09/20/2024)
09/20/2024	<u>16</u>	ORDER denying <u>6</u> Partial Motion to Dismiss; denying <u>8</u> Partial Motion to Dismiss <i>First Amended Complaint</i> . Notice of Agency Inaction <u>13</u> is struck. Signed by Judge Royce C. Lamberth on 09/20/2024. (lcrcl3) (Entered: 09/20/2024)