

**U.S. District Court  
District of Columbia (Washington, DC)  
CIVIL DOCKET FOR CASE #: 1:22-cv-01614-DLF**

FUNCTIONAL GOVERNMENT INITIATIVE v. UNITED STATES FEDERAL TRADE COMMISSION  
Assigned to: Judge Dabney L. Friedrich  
Cause: 05:552 Freedom of Information Act

Date Filed: 06/07/2022  
Jury Demand: None  
Nature of Suit: 895 Freedom of Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**FUNCTIONAL GOVERNMENT INITIATIVE**

represented by **Richard William Goeken**  
LUMEN LAW FIRM  
1802 Vernon Street, NW  
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Washington, DC 20009  
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**ATTORNEY TO BE NOTICED**

V.

**Defendant**

**UNITED STATES FEDERAL TRADE COMMISSION**

represented by **Stephanie R. Johnson**  
DOJ-USAO  
601 D Street, NW  
Washington, DC 20530  
(202) 252-7874  
Email: [Stephanie.Johnson5@usdoj.gov](mailto:Stephanie.Johnson5@usdoj.gov)  
**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
06/07/2022	<u>1</u>	COMPLAINT <i>FUNCTIONAL GOVERNMENT INITIATIVE</i> against FUNCTIONAL GOVERNMENT INITIATIVE <i>UNTED STATES FEDERAL TRADE COMMISSION</i> ( Filing fee \$ 402 receipt number ADCDC-9289900) filed by FUNCTIONAL GOVERNMENT INITIATIVE. (Attachments: COMPLAINT <i>FUNCTIONAL GOVERNMENT INITIATIVE</i> against FUNCTIONAL GOVERNMENT INITIATIVE <i>UNTED STATES FEDERAL TRADE COMMISSION</i> ( Filing fee \$ 402 receipt number ADCDC-9289900) filed by FUNCTIONAL GOVERNMENT INITIATIVE. (Attachments: # <u>1</u> Civil Cover Sheet Cover Sheet 22-cv-01614, # <u>2</u> Exhibit Exhibit 1 – Letter from President Biden to Commissioner Kahn 11.17.2111.17.21., # <u>3</u> Exhibit Exhibit 2 – Letter from NEC Director Deese to FTC Commissioner Kahn 8.11.21, # <u>4</u> Exhibit Ex# <u>1</u> Civil Cover Sheet Cover Sheet 22-cv-01614, # <u>2</u> Exhibit Exhibit 1 – Letter from President Biden to Commissioner Kahn 11.17.2111.17.21., # <u>3</u> Exhibit Exhibit 2 – Letter from NEC Director Deese to FTC Commissioner Kahn 8.11.21, # <u>4</u> Exhibit Exhibit 3 – FOIA request from FGI to FTC 1.3.22, # <u>5</u> Exhibit Exhibit 4 – Letter from FTC Denying FGI's FOIA 3.10.22, # <u>6</u> Exhibit Exhibit 5 –FGI's FOIA appeal 3-23-2022, # <u>7</u> Exhibit Exhibit 6 – Letter from FTC to FGI Regarding FGI'hibit 3 – FOIA request from FGI to FTC 1.3.22, # <u>5</u> Exhibit Exhibit 4 – Letter from FTC Denying FGI's FOIA 3.10.22, # <u>6</u> Exhibit Exhibit 5 –FGI's FOIA appeal 3-23-2022, # <u>7</u> Exhibit Exhibit 6 – Letter from FTC to FGI Regarding FGI's Appeal, # <u>8</u> Summons Summons – FTC c/o U.S. Att. Gen., # <u>9</u> Summons Summons – FTC c/o U.S. Attorney for D.C., # <u>10</u> Summons Summons – FTC General Counsel)(Goeken, Richard) (Attachment 1 replaced on 6/8/2022) (znmg).s Appeal, # <u>8</u> Summons Summons – FTC c/o U.S. Att. Gen., # <u>9</u> Summons Summons – FTC c/o U.S. Attorney for D.C., # <u>10</u> Summons Summons – FTC General Counsel)(Goeken, Richard) (Attachment 1 replaced on 6/8/2022) (znmg). Modified on 6/8/2022 to replace fillable

		civil cover sheet (znmg). (Entered: 06/07/2022)
06/07/2022	<u>2</u>	ERRATA <i>Correcting Caption in Complaint to Reflect Defendant's Address</i> by FUNCTIONAL GOVERNMENT INITIATIVE. (Attachments: # <u>1</u> Errata Corrected Caption In Complaint Adding Defendant's Street Address)(Goeken, Richard) (Entered: 06/07/2022)
06/08/2022		Case Assigned to Judge Dabney L. Friedrich. (znmg) (Entered: 06/08/2022)
06/08/2022	<u>3</u>	SUMMONS (3) Issued Electronically as to UNITED STATES FEDERAL TRADE COMMISSION, U.S. Attorney and U.S. Attorney General (Attachment: # <u>1</u> Notice and Consent)(znmg) (Entered: 06/08/2022)
06/08/2022	<u>4</u>	STANDARD ORDER for Civil Cases. See text for details. Signed by Judge Dabney L. Friedrich on June 8, 2022. (lcldf3) (Entered: 06/08/2022)
07/06/2022	<u>5</u>	NOTICE of Appearance by Stephanie R. Johnson on behalf of UNITED STATES FEDERAL TRADE COMMISSION (Johnson, Stephanie) (Entered: 07/06/2022)
07/14/2022	<u>6</u>	Consent MOTION for Extension of Time to File Answer re <u>1</u> Complaint,,,,,, by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 07/14/2022)
07/14/2022		MINUTE ORDER. Upon consideration of defendant's <u>6</u> Consent Motion for Extension of Time, it is hereby ORDERED that the motion is GRANTED. Accordingly, the defendant shall answer or otherwise respond to the plaintiff's <u>1</u> Complaint on or before August 22, 2022. So Ordered by Judge Dabney L. Friedrich on July 14, 2022. (lcldf3) (Entered: 07/14/2022)
08/21/2022	<u>7</u>	ANSWER to Complaint by UNITED STATES FEDERAL TRADE COMMISSION.(Johnson, Stephanie) (Entered: 08/21/2022)
08/22/2022		MINUTE ORDER requiring the parties to meet and confer and file a joint status report proposing a schedule for further proceedings. The report should address the status of the plaintiff's FOIA request, including the anticipated number of documents responsive to the request and the anticipated date(s) for release of the requested documents. The parties shall file the joint status report on or before September 6, 2022. So ordered by Judge Dabney L. Friedrich on August 22, 2022. (lcldf3) (Entered: 08/22/2022)
09/06/2022	<u>8</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 09/06/2022)
09/07/2022		MINUTE ORDER. Upon consideration of the parties' <u>8</u> Joint Status Report, it is hereby ORDERED that the parties file another joint status report on or before October 13, 2022. So Ordered by Judge Dabney L. Friedrich on September 7, 2022. (lcldf3) (Entered: 09/07/2022)
10/13/2022	<u>9</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 10/13/2022)
10/13/2022		MINUTE ORDER. Upon consideration of the parties' <u>9</u> Joint Status Report, it is hereby ORDERED that the parties file another joint status report on or before January 17, 2023. So Ordered by Judge Dabney L. Friedrich on October 13, 2022. (lcldf2) (Entered: 10/13/2022)
01/17/2023	<u>10</u>	Consent STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 01/17/2023)
01/17/2023		MINUTE ORDER. Upon consideration of the parties' <u>10</u> Joint Status Report, it is hereby ORDERED that the parties file another joint status report on or before February 28, 2023. So Ordered by Judge Dabney L. Friedrich on January 17, 2023. (lcldf2) (Entered: 01/17/2023)
02/28/2023	<u>11</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 02/28/2023)
03/01/2023		MINUTE ORDER. Upon consideration of the parties' <u>11</u> Joint Status Report, it is hereby ORDERED that the parties file another joint status report on or before March 15, 2023. So Ordered by Judge Dabney L. Friedrich on March 1, 2023. (lcldf2)

		(Entered: 03/01/2023)
03/15/2023	<u>12</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 03/15/2023)
03/15/2023		MINUTE ORDER. Upon consideration of the parties' <u>12</u> Joint Status Report, it is hereby ORDERED that the parties file another joint status report on or before April 14, 2023. So Ordered by Judge Dabney L. Friedrich on March 15, 2023. (lcldf2) (Entered: 03/15/2023)
04/14/2023	<u>13</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 04/14/2023)
04/17/2023		MINUTE ORDER. Upon consideration of the parties' <u>13</u> Joint Status Report, it is hereby ORDERED that the parties file another joint status report on or before June 2, 2023. So Ordered by Judge Dabney L. Friedrich on April 17, 2023. (lcldf2) (Entered: 04/17/2023)
06/02/2023	<u>14</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 06/02/2023)
06/05/2023		MINUTE ORDER. Upon consideration of the parties' <u>14</u> Joint Status Report, it is hereby ORDERED that the parties file another joint status report on or before July 12, 2023. So Ordered by Judge Dabney L. Friedrich on June 2, 2023. (lcldf2) (Entered: 06/05/2023)
07/11/2023	<u>15</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 07/11/2023)
07/12/2023		MINUTE ORDER. Upon consideration of the parties' <u>15</u> Joint Status Report, it is hereby ORDERED that the parties file another joint status report on or before July 31, 2023. So Ordered by Judge Dabney L. Friedrich on July 12, 2023. (lcldf2) (Entered: 07/12/2023)
07/31/2023	<u>16</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 07/31/2023)
07/31/2023		MINUTE ORDER. Upon consideration of the parties' <u>16</u> Joint Status Report, it is hereby ORDERED that the parties file another joint status report on or before August 31, 2023. So Ordered by Judge Dabney L. Friedrich on July 31, 2023. (lcldf2) (Entered: 07/31/2023)
08/31/2023	<u>17</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 08/31/2023)
08/31/2023		MINUTE ORDER. Upon consideration of the parties' <u>17</u> Joint Status Report, it is hereby ORDERED that the parties are directed to file another joint status report by September 29, 2023, informing the Court as to their progress resolving the remaining issues in this case and, if necessary, proposing a briefing schedule for all remaining issues. So Ordered by Judge Dabney L. Friedrich on August 31, 2023. (lcldf2) (Entered: 08/31/2023)
08/31/2023		Set/Reset Deadlines: Status Report due by 9/29/2023 (zjch, ) (Entered: 09/01/2023)
09/29/2023	<u>18</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 09/29/2023)
10/02/2023		MINUTE ORDER. Upon consideration of the parties' <u>18</u> Joint Status Report, it is hereby ORDERED that the parties are directed to file another joint status report by November 13, 2023, informing the Court as to their progress resolving the remaining issues in this case and, if necessary, proposing a briefing schedule for all remaining issues. So Ordered by Judge Dabney L. Friedrich on October 2, 2023. (lcldf2) (Entered: 10/02/2023)
10/02/2023		Set/Reset Deadlines/Hearings: Status Report due by 11/13/2023 (zjch, ) (Entered: 10/03/2023)
11/13/2023	<u>19</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 11/13/2023)

11/13/2023		MINUTE ORDER. Upon consideration of the parties' <u>19</u> Joint Status Report, it is hereby ORDERED that the parties are directed to file another joint status report by December 22, 2023, informing the Court as to their progress resolving the remaining issues in this case and, if necessary, proposing a briefing schedule for all remaining issues. So Ordered by Judge Dabney L. Friedrich on November 13, 2023. (lcldf2) (Entered: 11/13/2023)
12/21/2023	<u>20</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 12/21/2023)
12/21/2023		MINUTE ORDER. Upon consideration of the parties' <u>20</u> Joint Status Report, it is hereby ORDERED that the parties are directed to file another joint status report by February 1, 2024, informing the Court as to their progress resolving the remaining issues in this case and, if necessary, proposing a briefing schedule for all remaining issues. So Ordered by Judge Dabney L. Friedrich on December 21, 2023. (lcldf2) (Entered: 12/21/2023)
02/01/2024	<u>21</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 02/01/2024)
02/01/2024		MINUTE ORDER. Upon consideration of the parties' <u>21</u> Joint Status Report, it is hereby ORDERED that the parties are directed to file another joint status report by April 1, 2024, informing the Court as to their progress resolving the remaining issues in this case and, if necessary, proposing a briefing schedule for all remaining issues. So Ordered by Judge Dabney L. Friedrich on February 1, 2024. (lcldf2) (Entered: 02/01/2024)
04/01/2024	<u>22</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 04/01/2024)
04/02/2024		MINUTE ORDER. Upon consideration of the parties' <u>22</u> Joint Status Report, it is hereby ORDERED that the parties are directed to file another joint status report by April 26, 2024, informing the Court as to their progress resolving the remaining issues in this case and, if necessary, proposing a briefing schedule for all remaining issues. So Ordered by Judge Dabney L. Friedrich on April 2, 2024. (lcldf2) (Entered: 04/02/2024)
04/26/2024	<u>23</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 04/26/2024)
04/26/2024		MINUTE ORDER. Upon consideration of the parties' <u>23</u> Joint Status Report, it is hereby ORDERED that the parties are directed to file another joint status report by August 15, 2024, informing the Court as to their progress resolving the remaining issues in this case and, if necessary, proposing a briefing schedule for all remaining issues. So Ordered by Judge Dabney L. Friedrich on April 26, 2024. (lcldf2) (Entered: 04/26/2024)
06/23/2024	<u>24</u>	NOTICE by FUNCTIONAL GOVERNMENT INITIATIVE (Goeken, Richard) (Entered: 06/23/2024)
06/23/2024	<u>25</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by FUNCTIONAL GOVERNMENT INITIATIVE (Goeken, Richard) (Entered: 06/23/2024)
08/15/2024	<u>26</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 08/15/2024)
08/15/2024		MINUTE ORDER. Upon consideration of the parties' <u>26</u> Joint Status Report, it is hereby ORDERED that the parties are directed to file another joint status report by September 18, 2024, informing the Court as to their progress resolving the remaining issues in this case and, if necessary, proposing a briefing schedule for all remaining issues. So Ordered by Judge Dabney L. Friedrich on August 15, 2024. (lcldf2) (Entered: 08/15/2024)
09/18/2024	<u>27</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 09/18/2024)

09/18/2024		MINUTE ORDER. Upon consideration of the parties' <u>27</u> Joint Status Report, it is hereby ORDERED that the parties are directed to file another joint status report on or before October 17, 2024, informing the Court as to their progress resolving the remaining issues in this case and, if necessary, proposing a briefing schedule for all remaining issues. So Ordered by Judge Dabney L. Friedrich on September 18, 2024. (lcldf2) (Entered: 09/18/2024)
10/17/2024	<u>28</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 10/17/2024)
10/17/2024		MINUTE ORDER. Upon consideration of the parties' <u>28</u> Joint Status Report, it is hereby ORDERED that the parties are directed to file another joint status report on or before November 22, 2024, informing the Court as to their progress resolving the remaining issues in this case and, if necessary, proposing a briefing schedule for all remaining issues. So Ordered by Judge Dabney L. Friedrich on October 17, 2024. (lcldf2) (Entered: 10/17/2024)
11/22/2024	<u>29</u>	Joint STATUS REPORT by UNITED STATES FEDERAL TRADE COMMISSION. (Johnson, Stephanie) (Entered: 11/22/2024)
11/25/2024		MINUTE ORDER. Upon consideration of the parties' <u>14</u> Joint Status Report, the parties are directed to file another joint status report on or before January 14, 2025. So Ordered by Judge Dabney L. Friedrich on November 25, 2024. (lcldf2) (Entered: 11/25/2024)
11/25/2024		Set/Reset Deadlines: Status Report due by 1/14/2025 (zjch, ) (Entered: 11/25/2024)