

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

THE PROTECT DEMOCRACY  
PROJECT, INC.,

*Plaintiff,*

v.

U.S. DEPARTMENT OF JUSTICE, *et al.*,

*Defendants.*

Case No. 20-cv-172-RC

**JOINT STATUS REPORT**

Pursuant to the Court’s Minute Order dated March 26, 2020, Plaintiff The Protect Democracy Project, Inc. and Defendants U.S. Department of Justice (“DOJ”), U.S. Department of Defense (“DOD”) and U.S. Department of State (“State”) hereby submit the following status report.

1. Since the parties filed their last status report on March 19, 2020, they have continued to engage in productive discussions regarding potential narrowing and prioritization of Plaintiff’s FOIA request, as well as a reasonable timetable for processing documents.

2. In the parties’ last status report, the Office of Legal Counsel (“OLC”) committed to processing the OLC memorandum by April 6, 2020. Defendants have notified Plaintiff that the OLC memorandum is currently going through the publication review process, which includes securing waivers of any privilege from the relevant stakeholders. OLC expects that process to be complete by the end of April. To avoid litigation over any withholding, Plaintiff has informed Defendants that it will not insist on OLC processing the memorandum at issue by April 6, 2020, and will instead wait for the publication determination. In the event that publication is delayed or

OLC determines that it will not publish the memorandum, Plaintiff reserves its right to seek a court order for immediate processing of the memorandum.

3. DOD's searches have located six unclassified responsive documents all of which are out for review with other components/agencies. DOD expects that review process to be complete by the end of April, after which DOD will produce any non-exempt portions of the six unclassified documents to Plaintiff.

4. Given the current pandemic and its effects on FOIA processing, none of the agencies are in a position to propose a processing schedule. The parties will continue to confer about Plaintiff's FOIA request and a reasonable processing timetable.

5. The parties propose filing another status report with the Court by May 29, 2020.

Dated: April 3, 2020

Respectfully submitted,

THE PROTECT DEMOCRACY PROJECT, INC.

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