## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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ACCURACY IN MEDIA, INC. *et al.*, Plaintiffs, v. DEPARTMENT OF DEFENSE *et al.*, Defendants.

Case No. 14-1589 (EGS)

## DEFENDANT DEPARTMENT OF STATE'S STATUS REPORT

In accordance with the Court's Minute Order dated December 23, 2015, Defendant Department of State ("State") submits this status report. *See* Minute Order of Dec. 23, 2015. On December 21, 2015, State produced to Plaintiffs all responsive, non-exempt documents that State knew about as of December 4, 2015. However, as explained in its December 21, 2015 Unopposed Motion for Extension of Final Production Deadline, which the Court granted, State has very recently located sources of potentially-responsive documents that have not previously been searched. Recently, State employees investigated and determined that these files should be searched for records responsive to Plaintiffs' FOIA request in this action.

To conduct these searches, State must upload the files to a system in which they can be electronically searched, a process that is nearly complete. Because it is not possible at this time to estimate the volume of potentially responsive documents, if any, that will be found, State proposes that it first complete the upload of the files so they are electronically searchable and then conduct searches for potentially responsive documents. State estimates it can complete this

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process and file a status report disclosing the volume of potentially responsive documents and proposing a revised schedule within fourteen (14) days of this status report.

State, therefore, respectfully proposes that by February 5, 2016, it shall complete its additional searches of these documents and file a status report disclosing the volume of potentially responsive documents that must be reviewed and proposing a revised schedule for the production of the non-exempt portions of responsive documents subject to the FOIA. Plaintiffs consent to this proposed schedule.

Dated: January 22, 2016

Respectfully submitted,

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