

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

ACCURACY IN MEDIA, INC. <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	Case No. 14-1589 (EGS)
DEPARTMENT OF DEFENSE <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**DEFENDANT DEPARTMENT OF STATE’S STATUS REPORT**

In accordance with the Court’s Minute Order dated February 1, 2016, Defendant Department of State (“State”) submits this status report. *See* Minute Order of Feb. 1, 2016. Plaintiffs initiated this Freedom of Information Act (“FOIA”) lawsuit against Defendants on September 19, 2014, seeking disclosure of documents related to the September 11, 2012 attack on the American embassy in Benghazi, Libya. (ECF No. 1). After Defendants had filed their answer, Plaintiffs filed a Supplemental Complaint on January 7, 2015, and a Second Amended Complaint on June 24, 2015. (ECF Nos. 11 & 31).

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.

State has completed uploading the files into a system in which they can be electronically searched and has conducted searches for potentially responsive documents. Based upon a keyword search, State has determined that there are 6,991 potentially responsive documents, but it expects that the ultimate number of responsive documents will be far fewer. State has determined that the production of any responsive, non-exempt documents will require two additional productions, the first of which will occur on March 21, 2016, with a subsequent and final production on May 5, 2016.<sup>1</sup>

State, therefore, respectfully proposes that it file a status report with the Court on March 25, 2016, updating the Court on the review and production of the non-exempt portions of responsive documents subject to the FOIA.

Dated: February 5, 2016

Respectfully submitted,

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<sup>1</sup> Under this proposed schedule, State will complete its production of documents prior to the Department of Defense's proposed production deadline of May 31, 2016. Therefore, this proposed schedule should have no other effect on the current schedule of this case, including any summary judgment briefing.