

**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 UNOPPOSED MOTION FOR EXTENSION OF
FINAL PRODUCTION DEADLINE**

1. Defendant Department of State (“State”), by and through undersigned counsel, hereby moves for a brief extension of time to complete its final production of documents in this Freedom of Information Act (“FOIA”) case.

2. Plaintiffs initiated this 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 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).

3. In its February 5, 2016 status report, State proposed that it make two additional productions of documents in this case, on March 21, 2016, and May 5, 2016. (ECF No. 41). In accordance with this proposed production schedule, State made an initial production of responsive, non-exempt documents to Plaintiffs on March 21, 2016, and filed a status report with

the Court on March 25, 2016, renewing its proposal to make a second and final production of any responsive, non-exempt documents on May 5, 2016. (ECF No. 42).

4. The Court did not enter any scheduling order in response to State's proposal, but on May 5, 2016, State will produce to Plaintiffs all responsive, non-exempt documents that State knew about as of March 21, 2016. However, State very recently identified a source of potentially-responsive documents that has not previously been searched in this case. Given the nature of this request and the documents that have already been produced to Plaintiffs, State expects the number of responsive, non-duplicate documents to be relatively small. However, it must first upload these files to a system in which they can be electronically searched and then conduct searches for potentially responsive documents. 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 that it can complete that search by May 12, 2016. The parties would then confer regarding a production schedule and file a joint status report on May 19, 2016.

5. Plaintiffs do not oppose this requested extension.

6. A proposed order is attached.

Dated: May 5, 2016

Respectfully submitted,

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