

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

**ACCURACY IN MEDIA, INC., et al.,**

*Plaintiffs,*

v.

**DEPARTMENT OF DEFENSE, et al.,**

*Defendants.*

Civil Action No. 14-1589 (EGS/DAR)

**JOINT STATUS REPORT**

Pursuant to the Court’s January 23, 2023 minute order, Plaintiffs Accuracy in Media, Inc., *et al.*, and Defendants Department of Defense, *et al.*, hereby submit this Joint Status Report in this Freedom of Information Act (“FOIA”) case.

**I. Background**

In their January 20, 2023 joint status report, the parties reported that Plaintiffs intended to challenge Defendants’ withholding of the documents that remain at issue in this case, which consist of certain FD-302s. ECF No. 94, at 1-2. The parties proposed that they would file a joint status report no later than February 16, 2023, setting forth the parties’ proposed summary judgment briefing schedule for these remaining documents. *Id.* at 2.

**II. The Parties’ Proposed Briefing Schedule**

The parties respectfully propose the following briefing schedule, which will allow Defendants time to compile the agency declarations necessary to support their dispositive motion:

- **June 29, 2023.** Defendants file their motion for summary judgment.

- **August 10, 2023.** Plaintiffs file a combined motion for summary judgment and response to Defendants' motion.
- **September 14, 2023.** Defendants file a combined response to Plaintiffs' motion and reply in support of Defendants' motion for summary judgment.
- **October 13, 2023.** Plaintiffs file a reply in support of Plaintiffs' motion for summary judgment.

DATED: February 16, 2023

Respectfully submitted,

BRIAN D. BOYNTON  
Principal Deputy Acting Assistant  
Attorney General

ELIZABETH J. SHAPIRO  
Deputy Director  
Federal Programs Branch

/s/ Joshua C. Abbuhl  
JOSHUA C. ABBUHL (D.C. Bar No. 1044782)  
Trial Attorney  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
1100 L Street, N.W.  
Washington, D.C. 20005  
Telephone: (202) 616-8366  
Facsimile: (202) 616-8470  
Joshua.Abbuhl@usdoj.gov  
*Counsel for Defendants*

/s/ John H. Clarke  
John H. Clarke  
D.C. Bar No. 388599  
1629 K Street, N.W.  
Suite 300  
Washington, DC 20006  
(202) 344-0776  
John@JohnHClarkeLaw.com  
*Attorney for Plaintiffs*