

parties proposed that DOD would conclude its searches for records that are potentially responsive to Plaintiffs' FOIA requests no later than May 4, 2015, and that DOD would produce documents to Plaintiffs on a rolling basis at eight-week intervals, the first of which would occur on June 1, 2015. The parties further proposed that DOD would file with the Court a Status Report on June 3, 2015. In accordance with this proposal, DOD made its first production of documents to Plaintiffs on June 1, 2015.

3. DOD now proposes that make its next production to Plaintiffs on July 27, 2015, with subsequent productions on September 21, 2015, and November 16, 2015. DOD further proposes that it file with the Court a Second Status Report on November 20, 2015, in which DOD will provide the Court with an update on the status of the production of responsive, non-exempt documents to Plaintiffs.

4. Similarly, in the Joint Meet and Confer Statement and proposed order, the parties proposed that State would conclude its searches for records that are potentially responsive to Plaintiffs' FOIA requests no later than May 4, 2015, and that it would produce documents to Plaintiffs on a rolling basis at eight-week intervals, the first of which would occur on March 16, 2015, and the second of which would occur on May 11, 2015. The parties further proposed that State would file with the Court a Status Report on June 3, 2015. In accordance with this proposal, State made its first production of documents to Plaintiffs on March 16, 2015, and a second production on May 11, 2015.

5. State now proposes that make its next production to Plaintiffs on July 6, 2015, with subsequent productions on August 31, 2015, and October 26, 2015. State further proposes that it file with the Court a Second Status Report on October 30, 2015, in which State will

provide the Court with an update on the status of the production of responsive, non-exempt documents to Plaintiffs.

Dated: June 3, 2015

Respectfully submitted,

BENJAMIN C. MIZER
Principal Deputy Assistant Attorney General
ELIZABETH J. SHAPIRO
Deputy Branch Director,
Federal Programs Branch

/s/ Megan A. Crowley
MEGAN A. CROWLEY
N.Y. Bar No. 4930376
Trial Attorney
United States Department of Justice
Civil Division, Federal Programs Branch
20 Massachusetts Avenue NW, Room 7221
Washington, D.C. 20001
Email: megan.a.crowley@usdoj.gov
Telephone: (202) 305-0754
Fax: (202) 616-8470

Attorneys for Defendant