

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

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

JOINT STATUS REPORT

On July 25, 2016, this Court entered an order lifting a partial stay of this Freedom of Information Act (“FOIA”) suit against defendant, the Central Intelligence Agency (“CIA”)¹ in light of the June 28, 2016 issuance of the U.S. House of Representatives Select Committee’s “Investigation and Report on the Terrorist Attack in Benghazi.” *See* Minute Order (July 25, 2016). On September 22, 2016, this Court directed the parties to submit a joint status report setting forth recommendations for further proceedings. *See* Minute Order (Sept. 22, 2016), which the parties did on September 27, 2016. *See* Joint Status Report, ECF No. 56 (Sept. 27, 2016).

In the September 2016 joint status report, counsel for the CIA explained that the agency had been conducting a search for documents potentially responsive to Plaintiffs’ narrowed FOIA request and expected to complete that search on or before October 31,

¹ In addition to Defendant, the CIA, Plaintiffs brought this FOIA action against Defendants, the United States Department of Defense, the Department of State, and the United States Department of Justice and its component, the Federal Bureau of Investigation (collectively, “Defendants”). *See generally* Compl., ECF No. 1 (Sept. 19, 2014).

2016. The parties also proposed to file an updated joint status report that included both a proposed production schedule for the CIA and a briefing schedule. *See id.*; *see also* November 21, 2016 Minute Order (granting the parties' Joint Motion for Extension of Time to File Joint Status Report, ECF No. 57).

Since the filing of the parties' September 2016 joint status report, the CIA has completed its search for records responsive to Plaintiffs' revised FOIA request. And to date, all Defendants, with the exception of the CIA, have produced all of the non-exempt records responsive to Plaintiff's FOIA request. Given the current status of this case, the parties now respectfully propose the following production and briefing schedule, which takes into consideration both the CIA's need for internal coordination with respect to the remaining responsive documents and the upcoming holiday season:

- February 28, 2017: The CIA produces any remaining responsive, non-exempt records
- March 31, 2017: Defendants file their summary judgment motion
- May 1, 2017: Plaintiffs file their cross-motion for summary judgment and opposition to Defendants' summary judgment motion
- May 15, 2017: Defendants file their reply in support of their summary judgment motion and in opposition to Plaintiffs' cross-motion for summary judgment
- May 30, 2017: Plaintiffs file their reply in support of their cross-motion for summary judgment.

Dated: December 1, 2016

Respectfully submitted,

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