

**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 MOTION TO AMEND BRIEFING SCHEDULE

On December 1, 2016, the parties to this Freedom of Information Act (“FOIA”) suit¹ filed a Joint Status Report that proposed a schedule for the CIA to produce any responsive, non-exempt records to Plaintiffs’ revised FOIA request and a briefing schedule for the parties’ cross-motions for summary judgment. *See Joint Status Report*, ECF No. 58 (Dec. 1, 2016). Pursuant to the parties’ December 1, 2016 Joint Status Report, the CIA agreed to produce the remaining responsive, non-exempt documents to Plaintiffs by February 28, 2017. *See id.* at 2. The parties also proposed that Defendants would move for summary judgment on March 31, 2017; that Plaintiffs would file an opposition to Defendants’ motion for summary judgment and cross-motion for summary judgment on May 1, 2017; that Defendants would then file their reply in support of their summary judgment motion and in opposition to Plaintiffs’ cross-motion for summary

¹ Plaintiffs brought this FOIA action against Defendants, the Central Intelligence Agency (“CIA”), the United States Department of Defense and several of its component departments, 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).

judgment on May 15, 2017; and that Plaintiffs would file their reply in support of their cross-motion for summary judgment on May 30, 2017. *See id.* On December 14, 2016, this Court issued a Minute Order adopting the parties' proposed production and briefing schedule. *See* Minute Order (Dec. 14, 2016).

Since the entry of the Court's December 14, 2016 Minute Order, the CIA has informed Plaintiff that it has completed its production of all of the responsive, non-exempt records to Plaintiffs' revised FOIA request. In addition, over the last two months, counsel for Plaintiffs and counsel for Defendants have had several telephone conferences in an effort to determine whether the issues in this action may be narrowed and in what manner. Those telephone conference calls have been productive, and the parties believe that with additional time, they may be able to substantially narrow the issues that are being challenged in this litigation.

To that end, the parties respectfully request that the Court amend the briefing schedule to allow the parties additional time to focus on substantially narrowing the issues involved in this FOIA action. With this additional time, Plaintiffs, who have been working diligently to review the records that Defendants have produced, will complete that review and determine which, if any, withholdings they intend to challenge. The entry of an amended briefing schedule will also allow the parties time to determine whether some of these issues may be resolved outside of litigation. Accordingly, the parties respectfully propose to amend the briefing schedule as follows, which takes into consideration both the time that Plaintiffs need to complete their review of the entire FOIA production and upcoming deadlines in other matters on which counsel are respectively working:

May 12, 2017: The parties file a Joint Status Report identifying generally what, if any, issues remain for the Court to resolve;

June 2, 2017: Defendants file their motion for summary judgment;

June 30, 2017: Plaintiffs file their cross-motion for summary judgment

July 14, 2017: Defendants file their reply in support of their motion for summary judgment and in opposition to Plaintiffs' cross-motion for summary judgment; and

July 28, 2017: Plaintiffs file their reply in support of their cross-motion for summary judgment.

Dated: March 19, 2017

Respectfully submitted,

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