

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

MICHAEL DRIGGS, *et al.*,

Plaintiffs,

v.

CENTRAL INTELLIGENCE AGENCY

Defendant.

Case No. 1:23-cv-1124 (DJN)

**JOINT STATUS REPORT**

The parties, through their respective counsel, hereby provide this joint status report in this case in light of the representations made in the joint status report the parties filed on February 10, 2025. Dkt. No. 34. The parties provide the following update:

1. After the parties submitted their joint status report they met and conferred regarding the matter of the challenged redactions and the search. Despite the parties' efforts, there is still a dispute that requires the Court's invention.

2. To resolve this dispute, the parties will cross move for summary judgment and Plaintiffs may move for *in camera* review of the released record to which Plaintiffs seek to challenge the redactions. Given the sensitive nature of the information at issue in Plaintiffs' FOIA request, and to ensure that it is properly vetted and approved for disclosure on a public docket, Defendant seeks the Court's permission to move for such relief on April 23, 2025. This provides Defendant with sufficient time to vet the information within the various departments in the agency and safeguard against inadvertent disclosure to the public.

3. Thus, the parties request a briefing schedule as follows:

- a. Defendant files a motion for summary judgment and accompanying memorandum on April 23, 2025.
- b. Plaintiffs file their motion for summary judgment and any memorandum in support thereof and in opposition to Defendant's motion for summary judgment no later than May 21, 2025.
- c. Defendant files a combined reply brief in further support of its motion for summary judgment and in opposition to Plaintiffs' motion for summary judgment no later than June 4, 2025
- d. Plaintiffs may file a reply brief in further support of their motion for summary judgment no later than June 18, 2025.

4. A proposed order is attached for the convenience of the Court.

Dated: February 28, 2025

Respectfully Submitted,

ERIK S. SIEBERT  
UNITED STATES ATTORNEY

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