

Count II
(News Media Status)

15. Plaintiffs restate paragraphs 1-14 as if fully repeated here.

16. Plaintiffs' November 25, 2019 letter requested status as a representative of the news media, and the administrative record demonstrates that plaintiff Mark Sauter is entitled to a waiver of search and review fees under 5 U.S.C. § 552 (a)(4)(A)(ii)(II).

WHEREFORE, Plaintiffs respectfully pray that this Court:

- (1) Order defendant grant plaintiff Mark Sauter status as representative of the news media under 5 U.S.C. § 552(a)(4)(A)(ii)(II);
- (2) Order defendant to conduct a thorough search for all responsive records;
- (3) Order defendant to promptly provide the information to plaintiffs, in electronic format, as requested; and
- (4) Award plaintiffs reasonable costs and attorneys' fees incurred in the prosecution of this action under 5 U.S.C. § 552 (a)(4)(E) and 28 U.S.C. § 2412(d).

DATE: April 20, 2020.

Respectfully submitted,

/s/ John H Clarke
John H. Clarke Bar No. 388599
1629 K Street, NW
Suite 300
Washington, DC 20006
(202) 344-0776
Fax (202) 332-3030
johnhclarke@earthlink.net
Attorney for Plaintiffs