

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

_____)	
ACCURACY IN MEDIA, INC. <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	
)	Case No. 14-1589 (EGS)
DEPARTMENT OF DEFENSE <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

DEFENDANT DEPARTMENT OF STATE’S STATUS REPORT

Plaintiffs initiated this Freedom of Information Act (“FOIA”) lawsuit against Defendants on September 19, 2014, seeking disclosure of documents related to the September 11, 2012 attack on the American embassy in Benghazi, Libya. (ECF No. 1). After Defendants filed their answer, Plaintiffs filed a Supplemental Complaint on January 7, 2015, and a Second Amended Complaint on June 24, 2015. (ECF Nos. 11 & 31).

On December 21, 2015, State produced to Plaintiffs all responsive, non-exempt documents that State knew about as of December 4, 2015. However, as explained in its December 21, 2015 Unopposed Motion for Extension of Final Production Deadline, which the Court granted, State has very recently located sources of potentially-responsive documents that have not previously been searched. (ECF No. 39). Recently, State employees investigated and determined that these files should be searched for records responsive to Plaintiffs’ FOIA request in this action.

As explained in State's status report dated February 5, 2016, State has completed uploading the files into a system in which they can be electronically searched and has conducted searches for potentially responsive documents. (ECF No. 41). State determined that there were 6,991 potentially responsive documents. State has nearly completed a responsiveness review of these documents and anticipates that fewer than 100 documents will be responsive to Plaintiffs' request. In accordance with the production schedule proposed in its February 5, 2016 status report, State made an initial production of responsive, non-exempt documents to Plaintiffs on March 21, 2016. State now respectfully renews its proposal to make a second and final production of any responsive, non-exempt documents on May 5, 2016.¹

Dated: March 25, 2016

Respectfully submitted,

BENJAMIN C. MIZER
Acting Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Branch Director

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 Department of State

¹ Under this proposed schedule, State will complete its production of documents prior to the Department of Defense's proposed production deadline of May 31, 2016. Therefore, this proposed schedule should have no other effect on the current schedule of this case, including any summary judgment briefing.