

and to drop in its entirety the request listed at paragraph 116(11) of the Second Amended Complaint.¹ *See* ECF No. 31. Plaintiffs' operative FOIA requests for these final documents now are limited to the following requests:

- Any and all videos depicting the United States Consulate in Benghazi, Libya (including the Special Mission Compound and the Annex) between September 10, 2012 and September 12, 2012. This request includes, but is not limited to (1) all videos and photographs obtained, transmitted, or recorded via any unmanned aerial vehicles (UAVs), and (2) video of closed-circuit television monitor at the Benghazi Mission facility's Tactical Operations Center on September 11th and 12th, 2013;
- All interview reports and interview transcripts generated from interviews with survivors of the September 11th and 12th attacks on the Benghazi mission and the Benghazi CIA Annex;
- All records of radio communications emanating from the Compound's Tactical Operations Center (TOC), on September 11th and 12th, 2012, whether made by Regional Security Officer (RSO) Alec Henderson or any other person. The word "emanating" here means "created on" either of those days;
- All records of Secretary Clinton's actions and communications for the 24-hour period beginning when first notified that the Benghazi Consulate was under attack that were generated on either September 11 or September 12, 2012. The word "generated" here means documents that were themselves generated on September 11th or 12th, 2012. Responsive records include: All records generated by Secretary Clinton, including all emails, memoranda, or notes; and Telephone logs or bills or other statements of all of her telephone calls placed or received;
- Records generated from August 2009, through October of 2011, regarding Secretary of State Clinton's recommendations regarding U.S. support to those seeking to oust forces loyal to Colonel Muammar Gaddafi and his government. The word "generated" here means documents that were themselves generated between August 2009 and October 2011;
- Records generated from March of 2011 through September of 2012, regarding Secretary of State Clinton's recommendations to support those seeking to oust forces loyal to the government of Bashar al-Assad. The word "generated" here means documents that were themselves generated between March 2011 and September 2012.

¹ State agrees that it will continue to process the request listed at paragraph 116(11) of the Second Amended Complaint as an administrative matter, but this request shall no longer be subject to any further proceedings in this case.

State has determined that it can complete the production of any non-exempt documents responsive to these requests on July 8, 2016.

The parties respectfully propose that they file a proposed briefing schedule with the Court on June 22, 2016.

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Respectfully submitted,

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