

**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.)	
)	

Joint Proposed Briefing Schedule

The parties, by and through their undersigned counsel, respectfully submit the following: Plaintiffs initiated this Freedom of Information Act (“FOIA”) lawsuit 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. Under the parties’ proposed production schedule, all defendants will have completed their production of responsive, non-exempt documents to plaintiffs by July 8, 2016. Defendant Department of Defense has agreed to provide Plaintiffs with a draft *Vaughn* no later than July 15, 2016.

Defendants therefore propose the following schedule:

Defendants’ Motion for Summary Judgment	September 30, 2016
Plaintiffs’ Response and any Cross-Motion	October 31, 2016
Defendant’s Reply and any Response to Cross-Motion	November 21, 2016
Plaintiff’s Reply to Response to Cross-Motion (if applicable)	December 5, 2016

Plaintiffs propose the following schedule:¹

Defendants' Motion for Summary Judgment	August 8, 2016
Plaintiffs' Response and any Cross-Motion	September 7, 2016
Defendant's Reply and any Response to Cross-Motion	September 19, 2016
Plaintiff's Reply to Response to Cross-Motion (if applicable)	September 28, 2016

Dated: June 24, 2016

Respectfully submitted,

s/ John H. Clarke

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¹ On the day of this filing, June 24, 2016, Plaintiffs informed Defendants that they plan to file a memorandum in support of their proposed briefing schedule. Plaintiffs respectfully request one week, until July 1, 2016, to file a memorandum in response, explaining why their proposed briefing schedule is appropriate. Plaintiffs do not oppose this request.