

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. 04-0814 (RCL)
	:	
CENTRAL INTELLIGENCE	:	ECF
AGENCY	:	
	:	
Defendant	:	

STATUS REPORT AND PROPOSED REVISED BRIEFING SCHEDULE

The Central Intelligence Agency (“CIA”), respectfully submits the following status report to update the Court on the progress it has made since filing the Joint Report to the Court and Proposed Briefing Schedule (“Joint Report”) on February 28, 2014 [ECF No. 209]. The Court has not issued a schedule that either adopted or rejected the schedule proposed by the parties in Document number 209. However, CIA has acted in accordance with the schedule set forth in the Joint Report and, on March 28, 2014, produced to Plaintiffs an inventory of all the documents in dispute.

The CIA’s inventory, as specified in the Joint Report, listed each responsive document in chart format, with the document (or “CO”) number, date, subject, the total number of pages in the document, and the FOIA exemptions asserted. Additionally, with respect to the documents that were released in part, the CIA has indicated the location of each document on the CD-Roms provided to Plaintiffs, indicating the CD number, file number, and page number in the PDF.

Under the terms of the original schedule, Plaintiffs agreed to select up to 100 partially withheld records to be included in CIA's future *Vaughn* index by April 11, 2014. Plaintiffs have advised that CIA additional time is needed for Plaintiff Hall to complete his selection of documents. CIA has no objection with providing Plaintiffs with additional time to review the documents. The CIA, after several rounds of communications with opposing counsel, proposes to amend schedule as follows:

- On or before, June 23, 2014, Plaintiffs will provide to undersigned counsel a sample of up to 100 partially-released documents that Plaintiffs select for the *Vaughn* index;
- July 22, 2014, the CIA will produce a *Vaughn* index for selected documents as well as any records withheld in full to Plaintiffs;
- August 21, 2014, the CIA will move for summary judgment;
- October 10, 2014, Plaintiffs will respond to the CIA's motion for summary judgment and submit cross motions, if any;
- November 10, 2014, CIA will file its opposition/reply;
- November 30, 2014, Plaintiffs will file their reply.¹

¹ This schedule was initially proposed by Plaintiffs via electronic mail sent on April 21, 2014. They have not offered another version since that date.

Wherefore the CIA respectfully requests that the above schedule be adopted by the Court and attaches a proposed Order herewith.

Respectfully submitted,

RONALD C. MACHEN JR., D.C. Bar #
447889
United States Attorney

DANIEL F. VAN HORN
Civil Chief, D.C. Bar # 924092

By: /s/ Mercedeh Momeni
MERCEDEH MOMENI
Assistant United States Attorney
Civil Division
555 Fourth St., N.W.
Washington, D.C. 20530
Telephone: 202-252-2515
Mercedeh.Momeni@usdoj.gov

Dated: May 13, 2014

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROGER HALL, et al.,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Civil Action No. 04-0814 (RCL)
	:	ECF
CENTRAL INTELLIGENCE	:	
AGENCY	:	
	:	
Defendant	:	

[PROPOSED] BRIEFING SCHEDULE

Upon consideration of the status report submitted by the Central Intelligence Agency (“CIA”), and the entire record herein, it is ORDERED that,

1. On or before, June 23, 2014, Plaintiffs will provide to undersigned counsel a sample of up to 100 partially-released documents that Plaintiffs select for the *Vaughn* index;
2. July 22, 2014, the CIA will produce a *Vaughn* index for selected documents as well as any records withheld in full to Plaintiffs;
3. August 21, 2014, the CIA will move for summary judgment;
4. October 10, 2014, Plaintiffs will respond to the CIA’s motion for summary judgment and submit cross motions, if any;
5. November 10, 2014, CIA will file its opposition/reply;
6. November 30, 2014, Plaintiffs will file their reply.

SO ORDERED on this _____ day of _____, 2014.

United States District Court Judge