

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

AMERICAN CIVIL LIBERTIES UNION.,
et al.,

Plaintiffs,

v.

CENTRAL INTELLIGENCE AGENCY,

Defendant.

Civil Action No. 18-2784 (CJN)

JOINT STATUS REPORT

Pursuant to the Court's February 28, 2020, Order, Plaintiffs American Civil Liberties Union, *et al.* and Defendant Central Intelligence Agency hereby submit this Joint Status Report in this Freedom of Information Act ("FOIA") case.

Defendant reports that it completed production to Plaintiffs of all non-exempt, responsive records subject to the FOIA on March 24, 2020. The parties propose that they have a further period of time to confer about the production and to determine if any issues remain in dispute. The parties propose to file another joint status report on April 27, 2020, which will include a proposed briefing schedule should further litigation prove necessary.

Respectfully submitted,

/s/ Dror Ladin

Dror Ladin (D.C. Bar No. NY0277)

Hina Shamsi (D.C. Bar No.

MI0071)

American Civil Liberties Union
Foundation

125 Broad Street, 18th Floor

New York, New York 10004

Tel: 212-549-2500

Fax: 212-549-2654
dladin@aclu.org
hshamsi@aclu.org

Arthur B. Spitzer (D.C. Bar No. 235960)
American Civil Liberties Union
of the District of Columbia
915 15th Street, NW, 2nd Floor
Washington, DC 20005
Tel: 202-457-0800
Fax: 202-457-0805
aspitzer@acludc.org

Attorneys for Plaintiffs

JOSEPH H. HUNT
Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Director

/s/ Joshua Kolsky
JOSHUA KOLSKY
Trial Attorney
D.C. Bar No. 993430
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW Washington, DC 20005
Tel.: (202) 305-7664
Fax: (202) 616-8470
E-mail: joshua.kolsky@usdoj.gov

Attorneys for Defendant