

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____	)	
DEMOCRACY FORWARD FOUNDATION,	)	
	)	
Plaintiff,	)	Civil Action No. 18-0375 (RC)
	)	
v.	)	
	)	
DEPARTMENT OF HOMELAND SECURITY,	)	
	)	
Defendant.	)	
_____	)	

JOINT STATUS REPORT

Plaintiff Democracy Forward Foundation and Defendant Department of Homeland Security, by and through the undersigned counsel, respectfully submit this Joint Status Report in this Freedom of Information Act ("FOIA") case.

As previously reported, Defendants completed their response to Plaintiff's request. Plaintiff has asked Defendant for additional information regarding the searches that each agency component performed, as well as a *Vaughn* index for Defendant's withholdings under FOIA Exemption 5, 5 U.S.C. § 552(b)(5). Given the large volume of documents that this would involve, the parties are continuing to confer regarding how to satisfy Plaintiff's concerns within a reasonable period of time. The parties anticipate that they will be able to resolve the issue within the next two weeks.

In light of the foregoing, the parties respectfully request that they file a further Joint Status Report on April 18, 2019.

Dated: April 4, 2019

Respectfully submitted,

/s/ Adam Grogg
Adam Grogg (D.C. Bar No. 1552438)
Javier M. Guzman (D.C. Bar No. 462679)
Democracy Forward Foundation
1333 H Street NW
Washington, DC 20005
(202) 448-9090

JESSIE K. LIU, DC Bar #472845
United States Attorney

DANIEL F. VAN HORN, DC Bar #924092
Chief, Civil Division

/s/ Paul Cirino

jguzman@democracyforward.org
agrogg@democracyforward.org

Attorneys for Plaintiff

PAUL CIRINO
Assistant United States Attorney
555 Fourth Street, N.W.
Washington, D.C. 20530
Telephone: (202) 252-2529
Facsimile: (202) 252-2599
paul.cirino@usdoj.gov

Counsel for Defendant