

**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 24, 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.

The parties regret that they did not file a joint status report by February 17, 2020 as ordered by the Court on November 6, 2019. Defendant's counsel recently switched to a new system for tracking litigation deadlines and the February 17 deadline was inadvertently not transferred to the new tracking system. In January 2019, Defendant's counsel informed Plaintiffs' counsel that Defendant needed to extend the previous production deadline until the end of February. Following this communication, Plaintiffs' counsel inadvertently misclassified the February 17 court deadline and the February 29 production deadline. The undersigned counsel apologize to the Court for the mistakes.

Defendant reports that it intends to produce to Plaintiffs all non-exempt, responsive records subject to the FOIA by tomorrow, February 29, 2020. The parties propose that they have a 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 March 27, 2020.

Respectfully submitted,

/s/ Dror Ladin

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