

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

_____)	
PROTECT DEMOCRACY)	
PROJECT, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 17-cv-02202 (RDM)
)	
DEPARTMENT OF HOMELAND)	
SECURITY, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

STATUS REPORT AND PROPOSED PRODUCTION SCHEDULE

Pursuant to the Court’s order from the bench at the Parties’ March 13, 2018, status conference, Defendants U.S. Department of Homeland Security (“DHS”) and U.S. Customs and Border Protection (“CBP”) (collectively, “the Defendants”), hereby provide the Court with the following Status Report and Proposed Production Schedule:

- **DHS** – DHS searches are complete as to five of the seven requested items. The search was halted for the remaining two items after the search yielded over 15.5 gigabytes each. DHS was unable to complete this search because the Office of the Chief Information Officer (“OCIO”) does not have the storage capacity to maintain a response that large and the DHS Office of Privacy (“PRIV”) likewise does not have capacity to receive the response. For the five searches completed, PRIV located a total of 5,412 pages of potentially responsive documents. DHS proposes to produce 250 pages per month, with production to begin on June 15, 2018.

- **DHS/OIG** – The DHS Office of the Inspector General (“DHS/OIG”) completed its processing and production of records to Plaintiff on March 26, 2018.
- **CBP** – CBP has completed its search for non-e-mail documents and is continuing to search for potentially responsive e-mail records. CBP’s search for non-e-mail documents has resulted in approximately 750 potentially responsive documents. CBP proposes to produce its non-e-mail documents to Plaintiff on June 22, 2018, and to process 500 e-mail records per month, with production of e-mails to begin on July 22, 2018.

Dated: April 13, 2018

Respectfully submitted,

JESSIE K. LIU, D.C. Bar No. 472845
United States Attorney

DANIEL F. VAN HORN, D.C. Bar No. 924092
Chief, Civil Division

By: /s/ Scott Leeson Sroka
SCOTT LEESON SROKA, Member of New York Bar
Assistant United States Attorney
555 Fourth Street, N.W.
Washington, D.C. 20530
Telephone: 202-252-7113
Scott.Sroka@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 13th day of April, 2018, that service of the foregoing **Status Report and Proposed Production Schedule** has been made on counsel of record through the Court's ECF system.

/s/ Scott Leeson Sroka

SCOTT LEESON SROKA
Assistant United States Attorney
555 Fourth Street, N.W.
Washington, D.C. 20530
Office: (202) 252-7113
Fax: (202) 252-2599
Email: Scott.Sroka@usdoj.gov