

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

**NATIONAL IMMIGRATION PROJECT  
OF THE NATIONAL LAWYERS GUILD**

**Plaintiff,**

**v.**

**U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT, et al.,**

**Defendants.**

**Civil Action No. 1:17-cv-2596-RCL**

**PLAINTIFF'S STATUS REPORT**

Plaintiff National Immigration Project of the National Lawyers Guild ("Plaintiff") provides this status report in accordance with this Court's Minute Order of November 21, 2019, after having attempted to confer with defendants U.S. Immigration and Customs Enforcement ("ICE") and United States Department of Homeland Security ("DHS") (collectively, "Defendants") and receiving no response.

In the parties' last joint status report (Dkt. 31), submitted on November 20, 2019, ICE agreed that, by December 6, 2019 (last Friday), it would (1) make another production of documents with fewer redactions to address outstanding redaction concerns and (2) distribute a revised Vaughn index to resolve omissions from its previous Vaughn index. This agreed deadline came and went with no response from Defendants.

That is not a new thing in this case, which Plaintiff filed two years ago. As evidenced by the six previous joint status reports in this case, dating back to June 18, 2018, Plaintiff has

attempted to work informally with the Defendants to narrow the issues and focus the case for this Court. This cooperative process, now littered with the Defendants' trail of broken self-imposed deadlines, has failed.

Accordingly, Plaintiff requests that this Court now set Defendants' schedule, imposing an expeditious deadline for the government (1) to produce documents with fewer redactions and (2) provide a completed Vaughn index. Plaintiff further requests that the Court direct Defendants to inform the Court when they have complied with the court-imposed deadlines (or, if they fail to comply, to explain their failure to the Court).

Dated: December 11, 2019

Respectfully Submitted,

/s/ Kayla Davis  
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