

**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

JOINT STATUS REPORT

Plaintiff National Immigration Project of the National Lawyers Guild (“Plaintiff”) and Defendants U.S. Immigration and Customs Enforcement and U.S. Department of Homeland Security (collectively, “Defendants”) have conferred and provide this joint status report per the Court’s January 2, 2020, Minute Order.

On December 11, 2019, counsel for Defendants sent Plaintiff a production of documents with fewer redactions (to address concerns that Plaintiff had raised) and a revised Vaughn index (to resolve omissions from its previous index). Defendants represent that the production and revised Vaughn index provide their explanation for each redaction that remains at issue, all of which involve FOIA Exemptions 5 and 7(E), 5 U.S.C. § 552(b)(5) and (7)(E).

Plaintiff is reviewing the submissions to determine what issues remain to be addressed through dispositive motions or otherwise. The parties intend to continue their communications to further resolve issues without the need for the Court’s involvement. Thus, they propose to file

another joint status report on March 4, 2020, advising the Court on the issues that remain to be litigated.

Dated: January 13, 2020

Respectfully Submitted,

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

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

By: _____ /s/
W. MARK NEBEKER, DC Bar #396739
Assistant United States Attorney
555 4th Street, N.W.
Washington, DC 20530
(202) 252-2536
mark.nebeker@usdoj.gov

Attorneys for Defendants

/s/ Kayla Davis
C. Kevin Marshall, DC Bar No. 476266
ckmarshall@jonesday.com
Kayla Davis, DC Bar No. 176873
kayladavis@jonesday.com
JONES DAY
51 Louisiana Ave N.W.
Washington, D.C. 20001
Telephone: +1.202.879.3939
Facsimile: +1.202.626.1700

Attorneys for Plaintiff