

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
AMERICAN CIVIL LIBERTIES UNION, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 22-1721 (JEB)
	)	
U.S. DEPARTMENT OF HOMELAND	)	
SECURITY,	)	
	)	
Defendant.	)	
_____	)	

**JOINT STATUS REPORT**

Pursuant to the Court’s Minute Order dated August 22, 2022, Plaintiffs American Civil Liberties Union and American Civil Liberties Union Foundation and Defendant United States Department of Homeland Security respectfully submit this Joint Status Report. The parties have been conferring about the Freedom of Information Act request at issue in this case and related matters. Plaintiffs have requested information, including the anticipated number of potentially responsive records, to better inform priorities and potential narrowing of the request. Defendant is still working to gather this information. These discussions have been productive and are ongoing. As a result, the parties are not yet in a position to propose a schedule for further proceedings. The parties anticipate continuing their discussions over the next couple weeks and propose submitting another joint status report by September 20, 2022.

\* \* \*

Dated: September 1, 2022

Respectfully submitted,

MATTHEW M. GRAVES, D.C. Bar #481051  
United States Attorney

BRIAN P. HUDAK  
Chief, Civil Division

By: /s/ Robert A. Caplen  
ROBERT A. CAPLEN, D.C. Bar #501480  
Assistant United States Attorney  
U.S. Attorney's Office, Civil Division  
601 D Street, N.W.  
Washington, D.C. 20530  
(202) 252-2523  
robert.caplen@usdoj.gov

*Counsel for Defendant*

/s/ Sana Mayat  
SANA MAYAT (admitted *pro hac vice*)  
BRETT MAX KAUFMAN, D.C. Bar #NY0224  
American Civil Liberties Union Foundation  
125 Broad Street—18th Floor  
New York, NY 10004  
(212) 549-2500  
smayat@aclu.org  
bkaufman@aclu.org

ARTHUR B. SPITZER, D.C. Bar #235960  
American Civil Liberties Union Foundation of the  
District of Columbia  
915 15th Street, N.W., 2nd Floor  
Washington, DC 20005  
(202) 601-4266  
aspitzer@acludc.org

*Counsel for Plaintiffs*