

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
NATIONAL ASSOCIATION OF CRIMINAL	)	
DEFENSE LAWYERS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No. 18-2399 (KBJ)
FEDERAL BUREAU OF PRISONS	)	
	)	
and	)	
	)	
DEPARTMENT OF JUSTICE,	)	
	)	
Defendants.	)	
_____	)	

**FIFTEENTH JOINT STATUS REPORT AND  
NOTICE OF DISCLOSURE COMPLETION**

Per the Court’s order, Plaintiff National Association of Criminal Defense Lawyers (“NACDL”) and Defendants Federal Bureau of Prisons (“BOP”) and Department of Justice (“DOJ”) respectfully submit this Fifteenth Joint Status Report. *See* Minute Order, May 6, 2020.

**Overview**

1. At issue in this case are three Freedom of Information Act (“FOIA”) requests filed by NACDL with various of Defendants’ component offices, which the parties have called “the BOP Request,” “the Main Justice Request,” and “the EOUSA Request.” *See* Ex. A to Am. Compl., ECF No. 9-2; Ex. B to Am. Compl., ECF No. 9-3; Ex. C to Am. Compl., ECF No. 9-4.

2. The parties have filed fourteen previous Joint Status Reports that provide more detail about their negotiations and the agencies’ productions to date. *See* Joint Status Report, ECF No. 20; Joint Status Report, ECF No. 22; 3d Joint Status Report, ECF No. 23; 4th Joint Status Report, ECF No. 24; 5th Joint Status Report, ECF No. 25; 6th Joint Status Report, ECF No. 26;

7th Joint Status Report, ECF No. 30; 8th Joint Status Report, ECF No. 31; 9th Joint Status Report, ECF No. 32; 10th Joint Status Report, ECF No. 33; 11th Joint Status Report, ECF No. 35; 12th Joint Status Report, ECF No. 36; 13th Joint Status Report, ECF No. 37; 14th Joint Status Report, ECF No. 39.

**Update and Proposed Schedule**

3. The parties have worked in good faith to narrow the scope of their dispute as much as possible. Some disputes remain, but the parties continue their efforts to narrow these issues. The parties expect to brief their remaining disputes.

4. Per the Court's General Order and Guidelines Applicable to FOIA Cases, ECF No. 6, the parties jointly propose the following schedule:

- a. NACDL will file its Second Amended Complaint by August 7, 2020.
- b. Defendants will file their First Amended Answer by August 21, 2020.
- c. Defendants will serve their Motion for Summary Judgement by September 14, 2020.
- d. NACDL will serve its Opposition to the Motion and its Cross-Motion for Summary Judgement by October 19, 2020.
- e. Defendants will serve their Reply on the Motion and their Opposition to the Cross-Motion by November 23, 2020.
- f. Plaintiffs will serve its Reply on the Cross-Motion by December 21, 2020.
- g. The parties propose the final filing date be set for December 23, 2020.

Dated: June 5, 2020

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Respectfully submitted,

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