

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

)	
JUDICIAL WATCH, INC.,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 18-02107 (TSC)
)	
U.S. DEPARTMENT OF JUSTICE,)	
)	
<i>Defendant.</i>)	
)	

DEFENDANT’S UNOPPOSED MOTION TO MODIFY THE SCHEDULE

Defendant United States Department of Justice (DOJ) moves the Court for a modification to the schedule for the release of records in this Freedom of Information Act (FOIA) case. Previously, DOJ moved for an extension of its deadline for briefing summary judgment, ECF No. 15, and a modification of the briefing schedule in order to allow for the release of the requested records, ECF No. 16.

As grounds for the relief requested, DOJ states as follows:

1. DOJ initially determined that the requested records in this case were to be withheld in full. After further review in conjunction with DOJ’s preparation of its motion for summary judgment, DOJ has decided to release the requested records in part to Plaintiff. In its motion requesting a modification to the briefing schedule, DOJ stated that it would make this release to Plaintiff by August 5, 2019, and the Court so ordered. *See* July 26, 2019 Minute Order.
2. DOJ is still engaged in internal discussions about the redactions necessary to release the requested records to the public. DOJ is endeavoring to release the requested records, which are the subject of significant public attention, to Plaintiff with as few redactions as

possible. In order to complete this process, DOJ respectfully requests a three-day extension of the release deadline in which to complete processing of the records and release them to the Plaintiff.

3. Accordingly, DOJ moves the Court to (a) order DOJ to make a release of non-exempt, responsive records to Plaintiff by August 8, 2019, and (b) order the parties to meet and confer after the release about any remaining challenges and to submit a joint status report on or before August 15, 2019, to propose next steps (including, if appropriate, a revised schedule for briefing summary judgment). A proposed order is attached to this motion for the Court's consideration.

4. Pursuant to Local Rule 7(m), DOJ consulted with Plaintiff regarding the relief sought in this motion, and Plaintiff does not oppose the requested relief.

Respectfully submitted,

August 5, 2019

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