

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

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BRENNAN CENTER FOR JUSTICE		)	
AT NYU SCHOOL OF LAW,		)	
		)	
Plaintiff,		)	
		)	
v.		)	Civil Action No. 1:20-cv-02674-TJK
		)	
UNITED STATES DEPARTMENT OF		)	
COMMERCE, <i>et al.</i> ,		)	
		)	
Defendants.		)	
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**JOINT STATUS REPORT**

Plaintiff and Defendants, by their counsel, respectfully submit this Joint Status Report pursuant to the Court’s Minute Order of June 17, 2021.

1. Defendants Census Bureau and Department of Commerce have completed their responses to subparts 1-3 of Plaintiff’s Freedom of Information Act (“FOIA”) requests, including the provision of revised *Vaughn* indices.

2. Subject to its review of Defendants Census Bureau’s and Department of Commerce’s responses to subpart 4, as outlined below, Plaintiff does not intend to seek additional records in response to subparts 1-3 of its FOIA requests.

3. Defendant Census Bureau completed its release of all non-exempt materials responsive to subpart 4 of Plaintiff’s FOIA requests, as narrowed by the parties, on Friday, August 13, 2021.

4. Defendant Department of Commerce has provided its final responses with regard to the vast majority of materials responsive to subpart 4, as narrowed by the parties. The only outstanding documents are those still undergoing inter-agency consultation. At this time,

Defendant Department of Commerce anticipates releasing all remaining non-exempt materials responsive to subpart 4, as narrowed by the parties, within 30 days. To the extent possible, Defendant Department of Commerce will release the outstanding materials on a rolling basis.

5. On August 11, 2021, counsel for Plaintiff and Defendants met and conferred regarding Defendants Census Bureau's and Department of Commerce's responses to subpart 4. The parties have agreed to work cooperatively to minimize or eliminate any remaining areas of dispute.

6. The parties jointly request permission to file another Joint Status Report in 45 days, on September 30, 2021. The additional time will afford Plaintiff the opportunity to review the materials recently released by Defendants, as well as permit the parties to continue their dialogue. In the September joint status report, the parties will put forth recommendations regarding how the case should proceed, including, if necessary, a proposal for summary judgment briefing and/or Plaintiff's potential application seeking an award of reasonable attorneys' fees incurred in connection with its pursuit of this action, pursuant to 5 U.S.C. § 552(a)(4)(E)(i).

Dated: August 16, 2021

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Respectfully submitted,

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