

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
CAMPAIGN LEGAL CENTER,	)	
	)	
Plaintiff,	)	
	)	Civil No. 18-1187 (TSC)
v.	)	Civil No. 18-1771 (TSC)
	)	
U.S. DEPARTMENT OF JUSTICE,	)	
	)	
Defendant.	)	
_____	)	

**JOINT STATUS REPORT**

Pursuant to the parties’ request in their July 12, 2021, Joint Status Report, Plaintiff Campaign Legal Center (“CLC”) and Defendant United States Department of Justice (“DOJ”) hereby submit this Joint Status Report in this Freedom of Information Act (“FOIA”) case.

As previously reported, the Civil Rights Division completed its supplemental search and completed its response by releasing three responsive emails on June 23, 2021. On July 9, 2021, the Justice Management Division completed its response by releasing an unredacted version of one email.

Aside from the matters on appeal, the only remaining issue before the Court is Defendant’s Exemption 5 withholdings in Case No. 18-1771. Specifically, the open issues relate to the following records or categories of records described by DOJ as follows:

1. “Email Correspondence with the White House” (previously also withheld in full pursuant to the presidential communication privilege);
2. “Draft USCCR Interrogatory Responses” (previously also withheld in full pursuant to the attorney work product doctrine);
3. Draft Correspondence Between JMD and Department of Commerce;

4. Draft Correspondence with Representative Gonzalez;
5. Deliberative Discussions Regarding Inter-Agency Correspondence;
6. Deliberative Discussions Regarding Congressional Correspondence;
7. Deliberative discussions regarding the drafting process;
8. Deliberative discussions regarding the Census and/or ACS; and
9. Document described as “Draft response. Census. Honorable Vicente Gonzalez”

The parties propose the following briefing schedule to resolve these issues:

Defendant’s Renewed Motion for Summary Judgment	September 17, 2021
Plaintiff’s Combined Renewed Cross-Motion for Summary Judgment and Opposition to Defendant’s Renewed Motion for Summary Judgment	October 19, 2021
Defendant’s Combined Opposition to Plaintiff’s Cross-Motion for Summary Judgment and Reply in Support of Defendant’s Renewed Motion for Summary Judgment	November 9, 2021
Plaintiff’s Reply in Support of Plaintiff’s Cross-Motion for summary Judgment	November 23, 2021

Dated: July 21, 2021

Respectfully submitted,

/s/ Adam Miller  
 BUCKLEY LLP  
 Adam Miller (DC Bar # 496339)  
 Nadav Ariel (DC Bar # 1023141)  
 1250 24th Street NW, Suite 700  
 Washington, DC 20037  
 202-349-7958  
 amiller@buckleyfirm.com

CAMPAIGN LEGAL CENTER  
 Danielle M. Lang (DC Bar # 1500218)  
 1411 K Street NW, Suite 1400  
 Washington, DC 20005  
 202-736-2200  
 dlang@campaignlegalcenter.org

*Counsel for Plaintiff*

CHANNING D. PHILLIPS, D.C. Bar #415793  
Acting United States Attorney

BRIAN P. HUDAK  
Acting Chief, Civil Division

By: /s/ Paul Cirino

PAUL CIRINO, D.C. Bar #1684555

Assistant United States Attorney

Civil Division

U.S. Attorney's Office for the District of Columbia

555 4th Street, N.W.

Washington, D.C. 20530

Telephone: (202) 252-2529

paul.cirino@usdoj.gov

*Counsel for Defendant*