

3. Plaintiff will not seek additional records in response to subpart 4 of its FOIA Requests, or, as noted in the August 16, 2021 Joint Status Report, any other subparts of its FOIA requests submitted to Defendants. Plaintiff has therefore determined that it will not further contest the completeness of Defendants' responses to its FOIA Requests or raise further challenges to Defendants' withholding of responsive records or portions of records based on claimed exemptions.

4. The parties have commenced negotiations regarding whether and to what extent Plaintiff is entitled to a reasonable attorneys' fee award, pursuant to 5 U.S.C. § 552(a)(4)(E)(i), and have agreed to work cooperatively to conclude this litigation.

5. The parties intend to file a further Joint Status Report in 60 days, on December 14, 2021, pursuant to the Court's Minute Order of June 17, 2021.

Dated: October 15, 2021

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Respectfully submitted,

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