UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

BRENNAN CENTER FOR JUSTICE AT NYU SCHOOL OF LAW,)))
Plaintiff,)
v.) Civil Action No. 1:20-cv-02674-TJK
UNITED STATES DEPARTMENT OF COMMERCE, et al.,)))
Defendants.)))

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. On October 15, 2021, the parties informed the Court that they 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.
 - 2. The parties are continuing to negotiate.
- 3. The parties intend to file a further Joint Status Report in 60 days, on February 14, 2022, pursuant to the Court's Minute Order of June 17, 2021.

Dated: December 14, 2021 Respectfully submitted,

BRIAN D. NETTER

/s/ Patrick J. Carome

Deputy Assistant Attorney General Patrick J. Carome (D.C. Bar No. 385676)

WILMER CUTLER PICKERING

ELIZABETH J. SHAPIRO

Deputy Director, Federal Program Branch

HALE AND DORR LLP

1875 Pennsylvania Avenue NW

/s/ Stephen M. Elliott

STEPHEN M. ELLIOTT

Senior Counsel (PA Bar No. 203986) United State Department of Justice Civil Division, Federal Programs Branch 1100 L St. NW

Washington, DC 20005 Tel: (202) 353-0889 Fax: (202) 616-8470

E-mail: stephen.m.elliott@usdoj.gov

Counsel for Defendants

Washington, DC 20006 (202) 663-6000 Patrick.Carome@wilmerhale.com

Mikayla C. Foster*
Rieko H. Shepherd*
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, MA 02109
(617) 526-6000
Mikayla.Foster@wilmerhale.com
Rieko.Shepherd@wilmerhale.com

Jared V. Grubow*
WILMER CUTLER PICKERING
HALE AND DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(212) 230-8800
Jared.Grubow@wilmerhale.com

Counsel for Plaintiff the Brennan Center for Justice at NYU School of Law

^{*} Pro hac vice