

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

GOVERNMENT ACCOUNTABILITY PROJECT,)	
)	
Plaintiff,)	
v.)	Case No: 17-2518 (CRC)
)	
U.S. DEPARTMENT OF HOMELAND SECURITY,)	
)	
Defendant.)	

JOINT STATUS REPORT

Pursuant to the Court’s order dated September 6, 2019, the parties, by and through undersigned counsel, report to the Court as follows on the status of the U.S. Department of Homeland Security’s (“DHS”) supplemental search pursuant to the Court’s order dated November 21, 2108.

1. On November 16, 2018, the parties filed a Joint Status Report reflecting the agreed-upon search terms for a supplemental search by DHS, as well as certain limited areas where the parties were in disagreement. By order dated November 21, 2018, the Court ruled that DHS need only conduct the additional search discussed in paragraph 3 of the November 16, 2018 report, but that it must use the date of that search as the cut-off date for search returns.

2. DHS regrettably states that, although it had endeavored to do so as explained herein, it has not yet completed the supplemental search consistent with the Court’s November 21, 2018 order because, in the preparation of this status report, it has realized that there was an oversight in terms of the cut-off date used for that search. Despite the Court’s order, DHS inadvertently utilized the cut-off date for the original search and only discovered this error as this report was being prepared. DHS did complete a search using the agreed-upon search terms,

albeit with the erroneous cut-off date, and its preliminary review of the results of that search has identified no responsive records. DHS is confirming that determination, and also is in the process of re-running the search with a cut-off date to June 21, 2019, the date it initiated the supplemental search. DHS expects that search to be completed by close of business today, September 13, 2019. Once DHS knows the number of documents returned, it will be able to advise the court of when it expects to be in a position to complete its review of those results and, if there are responsive records identified for processing, propose a production schedule to Plaintiff. DHS apologizes to the Court and Plaintiff for its oversight in failing to utilize the correct cut-off date.

3. The parties propose that they file a further status report by October 1, 2019.

Respectfully submitted,

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