## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

DEMOCRACY FORWARD FOUNDATION,

Plaintiff,

v.

Civil Action No. 25-0749 (TJK)

U.S. MARSHALS SERVICE.,

Defendant.

## JOINT PROPOSED SCHEDULE

Plaintiff Democracy Forward Foundation and Defendant U.S. Marshals Service ("USMS"), through counsel, respectfully submit this Joint Proposed Schedule pursuant to the Court's April 23, 2025, Minute Order.

- 1. This is a Freedom of Information Act ("FOIA") case. Plaintiff filed a complaint on March 14, 2025. ECF No. 1. In broad terms, Plaintiffs' FOIA requests seek records related to USMS contact with the Judiciary concerning January 6th cases, USMS enforcement of court orders, and USMS communications with the Department of Government Efficiency ("DOGE").
- 2. USMS has conducted initial searches for responsive records and has identified 4,343 potentially responsive records.
- Plaintiff has proposed certain steps to narrow the universe of responsive records.
   The parties continue to confer regarding potential narrowing of the request for communications with DOGE.
- 4. The parties propose to confer further regarding a schedule for processing and production of responsive records, and to propose that schedule in a further Joint Status Report.

The parties respectfully propose that they file an additional Joint Status Report on or before June 9, 2025, proposing a schedule for further proceedings.

Dated: May 7, 2025

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By: /s/ John J. Bardo

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Respectfully submitted,

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