

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

AMERICAN IMMIGRATION COUNCIL,)	
)	
Plaintiff)	
)	
v.)	
)	Civil Action No. 11-1972 (JEB)
UNITED STATES DEPARTMENT OF HOMELAND SECURITY, et al.,)	
)	
Defendants.)	
)	

JOINT STATUS REPORT AND MOTION FOR BRIEFING SCHEDULE

Plaintiff American Immigration Council (AIC) and Defendants, United States Department of Homeland Security (DHS) and U.S. Customs and Border Protection (CBP) (hereinafter “the Parties”), by and through undersigned counsel, and in accordance with the Court’s Minute Order of August 27, 2013, hereby respectfully submit this Joint Status Report to the Court.

At the August 27, 2013 Status Conference, the Parties informed the Court that there are nine documents which remain at issue in this litigation. Plaintiff requested that Defendants release four of the nine documents to Plaintiff, in full. In exchange, Plaintiff would forego challenges to the exemptions asserted by Defendants in the remaining five documents.¹ On September 10, 2013, Defendants determined that they cannot release the four documents in full. Therefore, the Parties hereby request that the Court adopt the following briefing schedule:

October 10, 2013: Defendants will file a Motion for Summary Judgment

November 8, 2013: Plaintiff will file an Opposition to Defendants’ Motion for Summary Judgment

¹ The Parties have resolved all issues pertaining to the scope of the search by Defendants. Beyond the dispute related to exemptions described above, attorneys’ fees are also still at issue between the Parties.

November 22, 2013: Defendants will file a Reply.

For the reasons cited above, the Parties respectfully request that the briefing schedule as stated above be granted. A proposed Order granting the relief sought is attached hereto.

DATED: September 10, 2013

Respectfully submitted,

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Defendants.)	
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ORDER

This matter is before the Court on the Parties' Joint Status Report and Motion for Briefing Schedule. Upon consideration of this Motion and the entire record of this case, it is this _____ day of _____, 2013,

ORDERED that the motion is **GRANTED**; and it is

FURTHER ORDERED that the Parties' requested briefing schedule shall be adopted.

UNITED STATES DISTRICT JUDGE