

4. Plaintiff disputes whether Defendant has conducted an adequate search as required by FOIA. Plaintiff will meet and confer with counsel for Defendant to raise questions about the parameters of the search and custodians searched in an effort to resolve the matter without further litigation. If that meet and confer is unsuccessful, the parties have agreed upon a briefing schedule as laid out below.

5. The parties propose the following schedule for the briefing of cross-motions for summary judgment:

Defendant's Motion for Summary Judgment:	January 31, 2018
Plaintiff's Cross-Motion and Opposition:	March 2, 2018
Defendant's Reply and Opposition to Cross-Motion:	March 28, 2018
Plaintiff's Reply in Support of Cross-Motion:	April 25, 2018

Respectfully submitted,

JESSIE K. LIU, D.C. BAR # 472845
United States Attorney

DANIEL F. VAN HORN, D.C. BAR # 924092
Civil Chief

By: _____/s/_____
JEREMY S. SIMON, D.C. BAR #447956
Assistant United States Attorney
Civil Division
555 4th Street, N.W.
Washington, D.C. 20530
(202) 252-2528
Jeremy.Simon@usdoj.gov

Counsel for Defendant

AND

