

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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JOHN SOLOMON,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF STATE,

Defendant.

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Civil Action No. 19-2019 (TNM)

**JOINT STATUS REPORT**

Defendant, the U.S. Department of State (“State”), and Plaintiff John Solomon, through counsel, submit the following status update in this Freedom of Information Act (“FOIA”) case:

1. As reported in previously filed Joint Status Reports, after State completed its initial processing and rolling production of records at the end of February 2020, the parties conferred and State agreed to pursue supplemental searches and releases of documents in response to Plaintiff’s concerns with certain withholdings. Consistent with State’s agreement to pursue supplemental searches and releases, State made supplemental productions monthly from June to December 2020.

2. On April 22, 2021, State provided a second “draft” *Vaughn* index to Plaintiff, which included the remaining records withheld in part under FOIA Exemptions 5 and 6 that were identified by Bates number in Plaintiff’s letter dated November 12, 2020. (The documents in this second *Vaughn* index reside on the classified network and, thus, required more time to access and *Vaughn* in light of COVID-19 constraints.)

3. On April 26, 2021, Plaintiff provided a letter to State identifying its remaining challenges to State’s withholdings.

4. On June 6, 2021, and June 11, 2021, in response to Plaintiff's April 26, 2021, letter and after a re-review of Plaintiff's challenged withholdings, State issued discretionary releases of some information previously withheld by State.

5. Plaintiff has reviewed the supplemental releases and the parties have conferred regarding the remaining exemptions. Based on State's release of records, the parties have reached an agreement to enter a joint stipulation of dismissal with prejudice. The parties request seven (7) days to file the stipulation.

6. Accordingly, the parties respectfully request to file a joint stipulation of dismissal by August 31, 2021.

Dated: August 24, 2021

/s/ Michael B. Buschbacher

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