UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN IMMIGRATION (COUNCIL, (COUNCIL)	
Plaintiff,	
v.)	Civil Action No. 18-1531 (RCL)
U.S. IMMIGRATIONS &) CUSTOMS ENFORCEMENT) et al.,	
Defendants.)	

DEFENDANTS' UNOPPOSED MOTION TO STAYORDER

In this Freedom of Information Act ("FOIA") case, by Order dated August 29, 2018, this Court ordered defendants to produce a <u>Vaughn</u> index and supporting dispositive motion by September 29, 2018. None of the defendants, however, has completed processing plaintiff's FOIA requests. Although certain searches for responsive documents have been undertaken, all three agencies intend to do further searches for responsive information. In order to narrow the issues that would require judicial resolution, defendants have forwarded to plaintiff proposed search terms to be used in completing the searches.

Plaintiff has stated that it will respond to defendants' proposed search terms on or before September 28, 2018. The parties will then try and resolve any differences, and once any differences are resolved, the searching will promptly begin.

For the foregoing reasons, defendants requests that this unopposed motion to stay the August 29, 2018 Order be granted, and that the parties be ordered to submit a joint proposed

schedule for further proceedings on or before October 15, 2018.

Respectfully submitted,

JESSIE K. LIU, D.C. BAR # 472845 United States Attorney for the District of Columbia

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

/s/ Marina Utgoff Braswell

MARINA UTGOFF BRASWELL, D.C. BAR #416587 Assistant United States Attorney U.S. Attorney's Office 555 4th Street, N.W. - Civil Division Washington, D.C. 20530 (202)252-2561 Marina.Braswell@usdoj.gov

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

AMERICAN IMMIGRATION COUNCIL,)))
Plaintiff,)
v.) Civil Action No. 18-1531 (RCL)
U.S. IMMIGRATIONS & CUSTOMS ENFORCEMENT, et al.,	
Defendants.)))

ORDER

UPON CONSIDERATION of defendants' unopposed motion to stay the Court's August 29, 2018 Order, and the entire record in this case, it is hereby

ORDERED that for good cause shown defendants' unopposed motion is granted; and it is further

ORDERED that the Court's Order dated August 29, 2018, is hereby stayed until October 15, 2018; and it is further

ORDERED that the parties shall file a proposed schedule for further proceedings on or before October 15, 2018.

UNITED STATES DISTRICT JUDGE