UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

DEMOCRACY FORWARD FOUNDATION, Plaintiff, v. UNITED STATES CITIZENSHIP AND IMMIGRATION SERVICES, Defendants.	Civil Action No. 8:26-cv-03035-DKC

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JOINT STATUS REPORT

Pursuant to the proceedings held before the Court on September 30, 2026, and this Court's September 30, 2026 Order, ECF No. 16, Plaintiff Democracy Forward Foundation ("DFF") and Defendant U.S. Citizenship and Immigration Services ("USCIS"), by and through their respective undersigned counsel, hereby submit the following joint status report and state:

1. In this matter, Plaintiff DFF seeks to compel the production of USCIS records under the Freedom of Information Act ("FOIA") regarding documents related to voter roll requests and other activities by the government related to the upcoming mid-term and other elections. *See* Complaint, ECF No. 1, ¶¶ 12, 21, 31, 40, 50.

2. USCIS searches for responsive records have identified approximately 100 pages of "component records" and approximately 1,700 pages of potentially responsive documents as a result of a search of electronically stored information of records maintained by previously identified custodians.

3. On October 28, 2026, counsel for the government informed counsel for Plaintiff that the ordered production of the approximately 100 pages of component records would not be

ready for production by the end of day, but would be produced by October 30, 2026. Plaintiff agreed to a slight delay in the production, provided it could be made by noon on October 30, 2026. On October 29, 2026, counsel for the government arranged for transmission of the approximately 100 pages of component records from USCIS to Plaintiff's counsel. Those documents were electronically transmitted that day.

4. The parties have conferred and agreed that USCIS will process the approximately 1,700 remaining pages of potentially responsive documents at a rate of at least 325 pages per month.

5. The parties respectfully propose to submit their next joint status report by December 4, 2026.

6. A proposed order is attached.

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Dated: October 30, 2026

Respectfully submitted,

Kelly O. Hayes
United States Attorney

/s/ *Theodore W. Atkinson*
Theodore W. Atkinson (Bar No. 32225)
Assistant United States Attorney
36 S. Charles Street, Fourth Floor
Baltimore, Maryland 21201
410-209-4921
Theodore.atkinson2@usdoj.gov

Counsel for Defendant

/s/ *Amy C. Vickery*
Amy C. Vickery
(D. Md. Bar No. 32381)
Daniel A. McGrath
(D. Md. Bar No. 31501)
Ronald A. Fein
(D. Md. Bar No. 32456)
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043
(202) 448-9090
avickery@democracyforward.org
dmcgrath@democracyforward.org
rfein@democracyforward.org

Counsel for Plaintiff

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