

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

DEMOCRACY FORWARD FOUNDATION,

Plaintiff,

vs.

U.S. CITIZENSHIP AND IMMIGRATION
SERVICES,

Defendant.

Case No. 26-cv-3035-DKC

Joint Status Report & Proposed Schedule

Pursuant to the proceedings held before the Court on September 30, 2026, 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* Compl. ¶¶ 12, 21, 31, 40, 50.

2. To date, USCIS searches for responsive records have identified approximately 100 pages of “component records.” USCIS’s email searches remain ongoing.

3. The parties have conferred and jointly propose the following initial next steps:

- a. By October 28, 2026, USCIS will process and produce nonexempt portions of the approximately 100 pages of “component records” collected to date; and

b. By October 30, 2026, the parties will confer and file a joint status report informing the Court of:

- (i) the results of USCIS's remaining searches (including the volume of potentially responsive records identified); and
- (ii) a proposed processing rate for production of nonexempt portions of the remaining records identified.

4. A proposed order is attached.

Dated: September 30, 2026

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Respectfully submitted,

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