UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CITIZENS FOR RESPONSIBILITY AND ETHICS IN WASHNGTON, *Plaintiff*, v. The U.S. DEPARTMENT OF HOMELAND SECURITY and U.S. CITIZENSHIP AND IMMIGRATION SERVICES, *Defendants*.	Civil Action No. 26-cv-3393 (BAH)

RETRIEVED FROM DEMOCRACYDOCKET.COM

JOINT STATUS REPORT

Pursuant to the Court's November 5, 2026, Minute Order, Plaintiffs Citizens for Responsibility and Ethics in Washington ("CREW") and Defendants the U.S. Department of Homeland Security ("DHS") and U.S. Citizenship and Immigration Services ("USCIS") (collectively, the Parties) respectfully submit this Joint Status Report.

This Court's Minute Order of November 5 directed the Parties to submit as attachments declarations from individuals with knowledge and responsibility for the processing of Plaintiff's FOIA requests providing an update as to the anticipated timeline and completion of the consultation process as to the fourteen pages of responsive records referred to in the Court's Minute Order of October 31, 2026 (the "OPA records"), unless the consultation of those records is completed.

On November 10, 2026, DHS made an interim disclosure to Plaintiff that consisted of the OPA records previously subject to consultation. Consequently, DHS does not attach declarations

addressing the anticipated timeline for competition of the consultation process to this Joint Status Report.

The Court's previous Minute Order also directed the Parties to propose a schedule to govern further proceedings. The Parties are continuing to confer regarding the status of Plaintiff's FOIA requests including over a proposed schedule to govern future proceedings. To allow those conversations to continue, the Parties respectfully propose the Court direct the Parties to file a Joint Status Report on or before Friday, November 13, in which the Parties will advise the Court of the current status of Plaintiff's FOIA request and the Parties' proposed schedule for further proceedings.

Dated: November 11, 2026.

Respectfully submitted,

/s/ Lauren C. Bingham
Lauren C. Bingham (D.C. Bar No. 90043462)
Samantha M. Creighton (D.C. Bar No. 90043959)*
Kayvan Farchadi (D.C. Bar No. 1672753)
John B. Hill (D.C. Bar No. 90044825)
Nikhel S. Sus (D.C. Bar No. 1017937)
CITIZENS FOR RESPONSIBILITY
AND ETHICS IN WASHINGTON
P.O. Box 14596 Washington, DC 20044
(202) 408-5565
lbingham@citizensforethics.org
screighton@citizensforethics.org
kfarchadi@citizensforethics.org
jhill@citizensforethics.org
nsus@citizensforethics.org

**admitted pro hac vice*

Attorneys for Plaintiff

RETRIEVED FROM DEMOCRACYDOCKET.COM

JONATHAN D. GUYNN
Acting Assistant Attorney General

s/ *Michelle R. Bennett*
MICHELLE R. BENNETT (CO Bar No. 37050)
Assistant Branch Director
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, D.C. 20005
Tel: (202) 305-8902
Email: michelle.bennett@usdoj.gov

Counsel for Defendants.

RETRIEVED FROM DEMOCRACYDOCKET.COM