UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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RYAN BAGWELL,

...

Plaintiff,

v.) Civil No. 15-cv-00334 CKK

U.S. DEPARTMENT OF EDUCATION Washington, DC 20202,

Defendant.

JOINT STATUS REPORT

Pursuant to this Court's Order dated April 28, 2015, defendant U.S. Department of Education, and plaintiff Ryan Bagwell, hereby file their Joint Status Report proposing a schedule for proceeding in this case brought under the Freedom of Information Act ("FOIA").

In response to plaintiff's FOIA request dated April 30, 2014, defendant issued its final response to that request on April 23, 2015. There are approximately 54,000 pages at issue. The parties have conferred as to how to proceed, and plaintiff has requested that defendant provide to plaintiff a list of categories of documents that have been withheld in full, in order for plaintiff to better assess which categories of documents he would like defendant to address in a Vaughn index or declaration. Defendant informed plaintiff that such a list

could be created in two weeks. Plaintiff would then like a week to review the list, to determine whether there are categories of documents that can be eliminated from the litigation. The parties would then like another week to confer about a proposed schedule for producing a <u>Vaughn</u> index or declaration of the categories of documents remaining in dispute.

Accordingly, the parties propose the following schedule for further proceedings in this case:

- (1) On or before June 11, 2015, defendant will provide to plaintiff a list of categories of documents that have been withheld; and
- (2) On or before June 18, 2015, plaintiff will inform defendant which categories of information plaintiff wants defendant to address in a Vaughn index or declaration; and
- (3) On or before June 25, 2015, the parties will file another Joint Status Report setting out a schedule for further proceedings in this case.

Respectfully submitted,

VINCENT H. COHEN, JR. D.C. BAR # 471489 Acting United States Attorney

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

/s/Marina Utgo⊅€ Braswell

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Counsel for Defendant

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Plaintiff pro se

SO ORDERED:				
	United	States	District	Judge

DATE: