

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

_____)	
ELECTRONIC FRONTIER)	
FOUNDATION,)	
)	
Plaintiff,)	
vs.)	Civil Action No. 06-CV-1773 (RBW)
)	
DEPARTMENT OF JUSTICE,)	
)	
Defendant.)	
_____)	

JOINT STATUS REPORT AND PROPOSED SCHEDULE

This is an action for injunctive and other relief under the Freedom of Information Act (FOIA). Plaintiff Electronic Frontier Foundation served its complaint on defendant Department of Justice on October 11, 2006. Defendant Department of Justice served its answer to the complaint on November 24, 2006, and, with leave from the Court, filed a supplement to its answer on December 1, 2006.

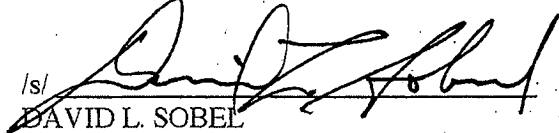
Because of the large number of potentially responsive documents and the anticipated delay in processing the plaintiff's FOIA request, the defendant intends to file a motion for an Open America stay. The parties have agreed to the following schedule for briefing of defendant's motion for an Open America stay:

Defendant shall file its opening brief by April 2, 2007.

Plaintiff shall file its brief in opposition by April 23, 2007.

Defendant shall file its reply brief by May 14, 2007.

Dated: February 23, 2007

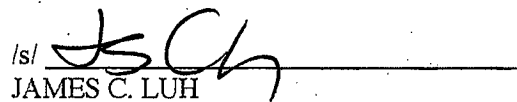
/s/ 

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Respectfully submitted,

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/s/ 

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