

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

LEN SAVAGE)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:16-cv-1212-CRC
)	
BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES)	
)	
)	
Defendants.)	
_____)	

JOINT STATUS REPORT

Plaintiff Len Savage and Defendant Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), by undersigned counsel and pursuant to the Court’s Minute Order entered August 3, 2016, respectfully submit this Joint Status Report.

This is a Freedom of Information Act (“FOIA”) lawsuit in which Plaintiff submitted a FOIA request to the ATF on May 7, 2016 seeking various records. *See* ECF Nos. 2-1, 2-2.

Plaintiff initiated the above-captioned lawsuit on June 21, 2016 and Defendant answered on September 26, 2016. *See* ECF No. 8. To date, Defendant has not issued a final response to Plaintiff’s FOIA request and has not produced any non-exempt records responsive to Plaintiff’s FOIA request.

Counsel for the parties conferred and were able to agree upon joint language for a status report addressing the Court’s August 3, 2016 Minute Order. Pursuant to this Court’s Minute Order, directing that the parties confer and file a joint proposed schedule for briefing or disclosure, the parties have agreed as follows:

Defendant Bureau of Alcohol, Tobacco, Firearms and Explosives:

- Friday, November 18, 2016 – first production deadline;
- Monday, December 19, 2016 – second production deadline;
- Wednesday, January 18, 2017 – third production deadline;
- Friday, February 17, 2017 – fourth production deadline; and
- Monday, March 20, 2017 – fifth and final production deadline.

Proposed Scheduling Timeframe:

- Plaintiff will identify any redactions or withholdings that remain in dispute on or before April 10, 2017;
- *Vaughn* index (possibly draft) to be produced to Plaintiff on or before; May 10, 2017;
- Resolution of any disputes related to the *Vaughn* index due by June 9, 2017;
- Dispositive Motions due by July 10, 2017;
- Cross-Motion/Opposition to Dispositive Motion due by August 9, 2017; and
- Opposition to Cross-Motion/Reply to Opposition to Dispositive Motion by August 25, 2017.

Respectfully submitted,

/s/ Stephen D. Stamboulieh
Stephen D. Stamboulieh
Stamboulieh Law, PLLC
P.O. Box 4008
Madison, MS 39130
(601) 852-3440
stephen@sdslaw.us
DC District Court Bar# MS0009

Counsel for Plaintiff

CHANNING D. PHILLIPS, DC Bar #415793
United States Attorney

DANIEL F. VAN HORN, DC Bar #924092
Chief, Civil Division

By: _____ /s/
W. MARK NEBEKER, DC Bar #396739
Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that service of the foregoing Joint Status Report has been made through the Court's electronic transmission facilities on this 11th day of October 2016.

_____/s/
W. MARK NEBEKER, DC Bar #396739
Assistant United States Attorney
555 4th Street, N.W.
Washington, DC 20530
(202) 252-2536
mark.nebeker@usdoj.gov