

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JACQUELINE STEVENS,)	
)	
Plaintiff,)	
)	
v.)	No. 17 C 2494
)	
UNITED STATES DEPARTMENT OF)	Judge Lee
STATE,)	
)	
Defendant.)	

MOTION TO CONTINUE REPLY BRIEF DEADLINE

The United States Department of State, by John R. Lausch, Jr., United States Attorney for the Northern District of Illinois, moves to continue its deadline to file a reply in support of its motion for summary judgment (Dkt. 33) and in support states as follows:

1. In this FOIA case, the Department's reply in support of summary judgment is due on December 14, 2018. Dkt. 44.
2. In response to one of the arguments in plaintiff Jacqueline Stevens's response brief (Dkt. 48), the Department has initiated another records search in the hope of resolving the issue without the need for the court's intervention.
3. As of this filing, the Department has collected more than 1,000 potentially responsive records as a result of this search. A review of the material shows that most of the records are likely to be non-responsive to Stevens's FOIA request, and the Department believes it can finish processing the material and produce the responsive records by March 15, 2019.
4. Continuing the Department's reply deadline will allow the Department time to review the additional material and produce any responsive records without putting before the court an issue that can hopefully be resolved on the parties' own.

5. The Department proposes that the parties file a joint status report by March 22, 2019, with a proposal for how to proceed in the wake of the forthcoming production.

6. Stevens opposes the Department's proposed timeframe for releasing responsive records.

WHEREFORE, the Department requests that: (1) its deadline to file a reply in support of summary judgment be continued; and (2) that the parties be directed to file a joint status update by March 22, 2019.

Respectfully submitted,

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