UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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AMERICAN IMMIGRATION COUNCIL and TAHIRIH JUSTICE CENTER,
Plaintiffs,
V.
U.S. CUSTOMS AND BORDER PROTECTION; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; and U.S. DEPARTMENT OF HOMELAND SECURITY,
Defendants.

Civil Action No. 1:19-cv-02965-RC

JOINT STATUS REPORT

Defendants, U.S. Customs and Border Protection ("CBP"), U.S. Citizenship and Immigration Services ("USCIS"), and U.S. Department of Homeland Security ("DHS") (collectively, "Defendants"), and Plaintiffs, American Immigration Council ("AIC") and Tahirih Justice Center ("TJC"), each by its undersigned counsel, submit this joint status report in response to the Court's May 11 2023, Minute Order. The parties respectfully state as follows:

 As previously reported, the only remaining issue in this Freedom of Information Act ("FOIA") case is attorney's fees and costs.

2. In that connection, Plaintiff provided its settlement demand with respect to costs and fees in early June and the agencies have considered that demand. Furthermore, although no agreement on settlement has been reached as of this time, the agencies have responded to Plaintiff's settlement demand and the parties are optimistic that an agreement can be reached.

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3. Given this development and to give the parties additional time to explore paths to resolve this singular issue informally, the parties propose that they submit another Joint Status Report in thirty days, by September 22, 2023, to apprise the Court on the progress of this case. Should the parties resolve this matter before the next filing deadline, they shall promptly notify the Court.

Date: August 23, 2023,

/s/ Emma Winger EMMA WINGER* American Immigration Council **1331 G Street NW, Suite 200 Washington, DC 20005 Telephone: (202) 507-7512 ewinger@immcouncil.org

/s/ Claudia Valenzuela CLAUDIA VALENZUELA D.C. Bar #IL0056 IMMIGRANT LEGAL DEFENSE 1322 Webster Street Suite 300 Oakland, CA 94612 Telephone: (510) 519-1231 cvalenzuela@immcouncil.org * Admitted pro hac vice ** Not admitted to D.C. Practice limited to federal courts Counsel for Plaintiffs Respectfully Submitted,

MATTHEW M. GRAVES D.C. Bar No. 481052 United States Attorney

BRIAN P. HUDAK Chief, Civil Division

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