

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

FAIR LINES AMERICA FOUNDATION, INC.,)	
)	
Plaintiff,)	
)	
v.)	Civ. A. No. 1:21-cv-01361 (ABJ)
)	
UNITED STATES DEPARTMENT OF COMMERCE)	
)	
and)	
)	
UNITED STATES CENSUS BUREAU,)	
)	
Defendants.)	
)	

JOINT PROPOSED BRIEFING SCHEDULE

Pursuant to this Court’s July 29, 2021 minute order, the parties have met and conferred and now jointly submit the following proposed schedule for briefing summary judgment motions in this action. The parties hope that the proposed schedule will allow the Court to resolve this lawsuit, in which Plaintiffs seek disclosure of records in accordance with the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

Event	Deadline
Defendants’ Opening Motion for Summary Judgment	September 10, 2021
Plaintiff’s Opposition and Cross-Motion for Summary Judgment	October 1, 2021
Defendants’ Reply and Opposition to Plaintiff’s Cross-Motion for Summary Judgment	October 22, 2021
Plaintiff’s Reply to Defendants’ Opposition	November 12, 2021

The parties respectfully request that the Court issue an order establishing the proposed schedule for briefing summary judgment in this matter.

Respectfully submitted this 6th day of August, 2021.

/s/ Jason Torchinsky

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing Joint Proposed Briefing Schedule with the Clerk of the Court through the ECF system on August 6, 2021. This system provided a copy to and effected service of this document on all parties.

/s/ Jonathan D. Kossak

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