

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

**GEORGETOWN LAW CENTER ON
PRIVACY AND TECHNOLOGY, *et al.*,**

Plaintiffs,

v.

**CUSTOMS AND BORDER PROTECTION, *et
al.*,**

Defendants.

Case No. 1:25-cv-1732-RCL

PLAINTIFFS' STATUS REPORT

Pursuant to this Court's Order (ECF No. 16), Plaintiffs Georgetown Law Center on Privacy and Technology, Amica Center for Immigrant Rights, and Americans for Immigrant Justice, ("Plaintiffs") hereby submit this status report.

After receiving this Court's Order on August 29, 2025, undersigned counsel for Plaintiffs emailed Kartik Venguswamy, counsel for Defendants, on September 3, 2025, to schedule a meet and confer regarding a proposed schedule for production of responsive records, the production of a *Vaughn* index, further status reports, and the filing and briefing of dispositive motions. Mr. Venguswamy did not respond. Undersigned counsel for Plaintiffs followed up by email on September 8, 2025, reiterating that Plaintiffs were looking to schedule a meet and confer as ordered by this Court. As of the time of this filing, undersigned counsel has not received any response from Mr. Venguswamy. As such, Plaintiffs hereby submit this timely status report with a proposed schedule; Defendants' position on the proposed schedule is unknown.

- No later than October 1, 2025 – Defendants shall process all potentially responsive records and disclose all nonexempt material.
- No later than October 15, 2025 – Defendants shall file a *Vaughn* index
- October 30, 2025 – Parties shall file a status report.
- November 21, 2025 – Parties shall file any dispositive motions, with opposition briefing due December 5, 2025, and replies due December 12, 2025.

Dated: September 15, 2025

Respectfully submitted,

/s/ Amelia Christine Dagen
Amelia Christine Dagen (D.C. Bar No.
90004838)
Amica Center for Immigrant Rights
1025 Connecticut Ave. NW, Ste. 701

Washington, DC 20036
Tel.: (202) 998-3105
Fax: (202) 331-3341
amelia@caircoalition.org

/s/ Stephanie Glaberson
Stephanie Glaberson (D.C. Bar No. 177092)
Center on Privacy & Technology
Georgetown University Law Center
500 1st St., NW
Washington, DC 20001
Tel: (202) 662-9770
Stephanie.glaberson@georgetown.edu

/s/ Paul Chavez
Paul Chavez*
Christina LaRocca*
Americans for Immigrant Justice
2200 NW 72nd Ave.
P.O. Box No 520037
Miami, FL 33152
(305) 573-1106
pchavez@aijustice.org
clarocca@aijustice.org

Attorneys for Plaintiffs

**pro hac vice forthcoming*