

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.

Civil Action No. 25-1732 (RCL)

JOINT STATUS REPORT

By and through their respective undersigned counsel, the parties submit the following status report in response to this Court's October 31, 2025, Minute Order and Standing Order 25-59.

Plaintiffs filed this suit on or about June 3, 2025, and served the U.S. Attorney's Office on or about June 13, 2025. Plaintiffs seek to compel the production of documents in response to their FOIA requests.

Defendants have been working to search for and begin processing records responsive to the FOIA requests at issue in this matter. As previously reported, Defendant ICE had completed its searches and was prepared to begin productions before the recent lapse in government appropriations. (ECF No. 18). Defendant ICE proposes to begin productions within the next thirty days and estimates that it will require four rolling productions to complete its response to the FOIA request.

Defendant CBP has already issued a partial response to the FOIA request and is in the final review stage of additional responsive records; Defendant CBP estimates that it will begin rolling productions of records within the next sixty days.

Pursuant to this Court's October 22, 2025, Minute Order, the parties will file their next status report in thirty days—i.e., on or before January 21, 2026. The parties also agree that a status conference would be appropriate.

Dated: December 23, 2025
Washington, DC

/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
**Admitted pro hac vice*

Respectfully submitted,

JEANINE FERRIS PIRRO
United States Attorney

/s/ Kartik N. Venguswamy
KARTIK N. VENGUSWAMY
D.C. Bar No. #983326
Assistant United States Attorney
601 D Street, NW
Washington, D.C. 20530
Tel: (202) 252-1790
kartik.venguswamy@usdoj.gov

Attorneys for the United States of America

