

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

_____	)	
COUNCIL FOR GLOBAL EQUALITY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Civil Action No. 25-2615 (TJK)
U.S. DEPARTMENT OF STATE,	)	
	)	
Defendant.	)	
	)	
_____	)	

**JOINT STATUS REPORT**

Plaintiff Council for Global Equality and Defendant U.S. Department of State (“State”) through counsel, respectfully submit this Joint Status Report pursuant to the Court’s Minute Order (Feb. 6, 2025).

1. This is an action brought under the Freedom of Information Act (“FOIA”). Defendants answered the Complaint on December 4, 2025. This action involves three requests to State (F-2025-20911, the “Instructions Request”; F-2025-20912, the “Communications Request;” and F-2025-20916, the “Directives and Guidance Request”). *See* ECF No. 1.

2. The parties have come to an agreement with respect to the scope of FOIA requests F-2025-20616 and F-2025-20911 and State anticipates it will need 60-90 days to complete its search for potentially responsive records to these two requests and make its initial production for responsive, non-exempt records.

3. The parties are continuing to confer on the scope of FOIA request F-2025-20912. On March 5, 2026, State provided the number of potentially responsive records located to date for each custodian identified in part 2 of request F-2025-20912 and Plaintiff agreed to narrow this

request by withdrawing two custodians and five key terms from the search. At this time, State is unable to estimate when it will make its initial production of records responsive to this FOIA.

4. The parties respectfully propose that they file an additional joint status report by April 6, 2026, to update the Court on the status of the FOIA requests.

Dated: March 5, 2026

/s/ Anisha Hindocha

Anisha Hindocha (D.C. Bar No. 1725159)  
Daniel A. McGrath (D.C. Bar No. 1531723)  
Robin Thurston (D.C. Bar No. 1531399)  
Democracy Forward Foundation  
P.O. Box 34553  
Washington, D.C. 20043  
(202) 448-9090  
ahindocha@democracyforward.org  
dmcgrath@democracyforward.org  
rthurston@democracyforward.org

*Counsel for Plaintiff*

Respectfully submitted,

JEANINE FERRIS PIRRO  
United States Attorney

By: /s/ Saifuddin Kalowala  
Saifuddin Kalowala  
D.C. Bar # 90033387  
Assistant United States Attorney  
601 D Street, NW  
Washington, DC 20530  
(202) 252-2550  
Saifuddin.Kalolwala@usdoj.gov

*Attorneys for the United States of America*