

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

DEMOCRACY FORWARD FOUNDATION,

Plaintiff,

v.

U.S. OFFICE OF PERSONNEL  
MANAGEMENT, et al.,

Defendants.

Civil Action No. 25-3517 (RBW)

**JOINT PROPOSED SCHEDULE**

Pursuant to the Court’s February 2, 2026, Minute Order, Plaintiff, Democracy Forward Foundation, and Defendants, U.S. Office of Personnel Management (“OPM”), General Services Administration (“GSA”), U.S. Department of Housing and Urban Development (“HUD”), and Office of Management and Budget (“OMB”) (collectively “Defendants”), hereby submit the following joint proposed status update and schedule for further proceedings in this Freedom of Information Act (“FOIA”) matter, filed on October 1, 2025 (ECF No. 3).

1. Plaintiff has requested copies of certain records regarding the use of artificial intelligence in regulatory matters, and Defendants have been conducting searches and processing responsive documents, as described in paragraphs 2-6. The Parties have been conferring about search parameters, narrowing the requests in certain respects.

2. **OPM, Request 25-HQ-2031-F:** OPM completed searches for parts 1 and 2 of this request and identified no responsive records. The Parties agreed to narrow part 3, and OPM expects to complete these searches by March 30, 2026.

3. **OPM, Request 25-HQ-2032-F:** OPM completed the search for parts 1 and 2 and identified no responsive records. OPM expects to complete the search for part 3 by March 30, 2026.

4. **GSA:** GSA is continuing to search for and process records responsive to Parts 1, 2, 3, and 5 of the request. GSA completed the search for records responsive to Part 4 of the request. GSA estimates that the search for the remaining parts of the request will be complete by March 30, 2026. GSA transmitted its first interim response on February 4, 2026, consisting of 11 pages, released in full. To date, GSA has identified approximately 31,000 pages, but GSA has not addressed duplicates yet. GSA anticipates processing 300 pages per month and producing the responsive, non-exempt documents on a monthly basis. GSA anticipates it will transmit its second response by March 30, 2026. Plaintiff is willing to confer with GSA about its search and may consider narrowing measures in an effort to avoid an extended production schedule.

5. **HUD:** The Parties agreed to narrow the search in certain respects. HUD is continuing to search for and process records. HUD estimates that the search will be complete by March 4, 2026. HUD expects to process 300 pages per month and produce responsive, non-exempt documents on a monthly basis.

6. **OMB:** OMB completed the search for records responsive to the request. OMB identified just over 700 potentially responsive records. OMB expects to process 300 pages per month and produce responsive, non-exempt documents on a monthly basis. OMB is experiencing an increase in FOIA litigation demanding resources and anticipates it will transmit the first production by April 30, 2026.

7. It is premature to determine whether summary judgment briefing will be required. The parties will continue to confer throughout the course of this action in an effort to reduce and resolve any disputes without necessitating the Court's involvement.

8. The parties propose to submit a Joint Status Report to the Court by June 1, 2026, informing the Court of the status of this matter.

Dated: March 2, 2026  
Washington, DC

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