

provided Plaintiffs with its search terms. On October 20, 2020, the parties conferred again. The Department informed Plaintiffs that the documents located included the Fiscal Year 2020 performance agreement for the Federal Student Aid Chief Operating Officer, and Defendant produced that document in full. Plaintiffs note that the document produced was signed on September 17, 2020. The Department intends to complete its processing of the remaining pages potentially responsive to Plaintiff's FOIA request by November 10, 2020.

Accordingly, the parties respectfully propose that the file another joint status report by November 19, 2020, including a proposed briefing schedule if the parties determine briefing is necessary. A proposed order is attached.

Respectfully submitted,

/s/ Emma Lewis
EMMA LEWIS
D.C. Bar No. 144574
DANIEL MCGRATH
D.C. Bar #1531723
AMERICAN OVERSIGHT
1030 15th Street, N.W., B255
Washington, D.C. 20005
(202) 919-6303
emma.lewis@americanoversight.org
daniel.mcgrath@americanoversight.org

Attorneys for American Oversight

/s/ Alice W. Yao
ALICE W. YAO
D.C. Bar #493789
NATIONAL STUDENT LEGAL DEFENSE
NETWORK
1015 15th Street, N.W., Suite 600
Washington, D.C. 20005
(202) 734-7495
alice@defendstudents.org

*Attorney for National Student Legal Defense
Network*

MICHAEL R. SHERWIN
Acting United States Attorney

DANIEL F. VAN HORN, D.C. Bar #924092
Chief, Civil Division

By: /s/ Michael A. Tilghman II
MICHAEL A. TILGHMAN II
D.C. Bar #988441
Assistant United States Attorney
U.S. Attorney's Office, Civil Division
555 Fourth Street, N.W.
Washington, D.C. 20530
(202) 252-7117
Michael.Tilghman@usdoj.gov

Attorneys for the United States of America

Dated: October 20, 2020

