

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

**FREEDOM WATCH, INC.**

Plaintiff,

v.

**NATIONAL SECURITY AGENCY, ET.  
AL.,**

Defendants.

Civil Action No. 1:12-cv-01088-RLW

**SUPPLEMENT TO JOINT STATUS REPORT**

Plaintiff Freedom Watch here supplements its portion of the Joint Status Report of June 29, 2015. On August 19, 2015, the Obama Justice Department responded to its “search” using only three search terms that were ordered by the Court. Predictably, they “found” no documents.

In the meantime, much has been disclosed about former Secretary of State Hillary Clinton’s obstruction and violation of U.S. State Department policies, regulations and/or statutory law concerning her retention and deletion of emails on her private email server. For instance, the Honorable Emmet G. Sullivan ruled in open court and in a minute order in a related lawsuit styled *Judicial Watch v. Department of State*, No. 15-1363 (D.D.C.) that:

MINUTE ORDER. For the reasons stated by the Court at the August 20, 2015 status hearing, and as agreed to by Defendant’s counsel, the State Department is hereby ordered to request that the Federal Bureau of Investigation (FBI) inform it about any information recovered from Mrs. Clinton’s server and the related thumb drive that is: (a) potentially relevant to the FOIA request at issue in this case; and (b) not already in the State Department’s possession. The State Department shall file a status report, no later than Monday, September 21, 2015 at 12:00 p.m., informing the Court of the following: (1) the process agreed upon between the FBI and the State Department for the sharing of information relevant to this lawsuit; (2) the status of the Inspector General of the State Department’s report regarding Mrs. Clinton’s use of a private server; and (3) a timetable for the completion of any ongoing searches related to this lawsuit. Signed by Judge

Emmet G. Sullivan on August 20, 2015. (lcegs4) (Entered: 08/20/2015)

Exhibit 1.

Plaintiff therefore respectfully requests an expedited telephonic status conference to address having the U.S. State Department do a proper and full search, as well as the now adjudicated issue of former secretary Hillary Clinton's violation of U.S. State Department policies, regulations and/or statutory law, as is now apparent that a full scale cover up is under way, not just in this case but in other related cases involving the U.S. State Department. This court must respectfully address these issues expeditiously before further documentation is lost.

Dated: August 24, 2015

Respectfully Submitted,

/s/ Larry Klayman  
Larry Klayman, Esq.  
Freedom Watch, Inc.  
D.C. Bar No. 334581  
2020 Pennsylvania Ave. NW #345  
Washington, DC 20006  
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Email: leklayman@gmail.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24th day of August, 2015 a true and correct copy of the foregoing Notice (Case No. 1:12-cv-1088) was submitted electronically to the U.S. District Court for the District of Columbia and served via CM/ECF upon the following:

John K. Theis  
Trial Attorney  
Federal Programs Branch  
U.S. Department of Justice, Civil Division  
20 Massachusetts Avenue, NW  
Room 6107  
Washington, DC 20530  
John.K.Theis@usdoj.gov

*Attorney for Defendants.*

Respectfully Submitted,

/s/ Larry Klayman  
Larry Klayman, Esq.  
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Email: leklayman@gmail.com

# Exhibit 1

		File Response/Reply by U.S. DEPARTMENT OF STATE (Wechsler, Peter) (Entered: 08/18/2015)
08/18/2015		MINUTE ORDER denying <a href="#">28</a> Defendant's Opposed Motion for an Extension of Time. However, due to the Court's calendar, the status hearing will take place at 1:00 p.m. on August 20, 2015 in Courtroom 24A, rather than 12:00 p.m. as originally scheduled. Signed by Judge Emmet G. Sullivan on August 18, 2015. (lcegs4) Modified on 8/18/2015 (ztc). (Entered: 08/18/2015)
08/18/2015		Set/Reset Hearings: Status Conference set for 8/20/2015 at 1:00 PM in Courtroom 24A before Judge Emmet G. Sullivan. (tcr) (Entered: 08/18/2015)
08/19/2015	<a href="#">29</a>	REPLY to Response to Status Report filed by U.S. DEPARTMENT OF STATE. (Attachments: # <a href="#">1</a> Declaration)(Wechsler, Peter) (Entered: 08/19/2015)
08/20/2015		Minute Entry for proceedings held before Judge Emmet G. Sullivan: Status Hearing held on 8/20/2015. Court directs the government to file a status report on or before September 20, 2015 for reasons stated on the record in open Court. Further Status Hearing set for 10/1/2015 at 10:00 AM in Courtroom 24A before Judge Emmet G. Sullivan. Court to issue order accordingly. (Court Reporter Janice Dickman) (tcr) (Entered: 08/20/2015)
08/20/2015		MINUTE ORDER. For the reasons stated by the Court at the August 20, 2015 status hearing, and as agreed to by Defendant's counsel, the State Department is hereby ordered to request that the Federal Bureau of Investigation (FBI) inform it about any information recovered from Mrs. Clinton's server and the related thumb drive that is: (a) potentially relevant to the FOIA request at issue in this case; and (b) not already in the State Department's possession. The State Department shall file a status report, no later than Monday, September 21, 2015 at 12:00 p.m., informing the Court of the following: (1) the process agreed upon between the FBI and the State Department for the sharing of information relevant to this lawsuit; (2) the status of the Inspector General of the State Department's report regarding Mrs. Clinton's use of a private server; and (3) a timetable for the completion of any ongoing searches related to this lawsuit. Signed by Judge Emmet G. Sullivan on August 20, 2015. (lcegs4) (Entered: 08/20/2015)

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