

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

FREEDOM WATCH, INC.,

Plaintiff,

v.

ROBERT S. MUELLER, et al.,

Defendants.

Civil Action No. 18-cv-88

PLAINTIFF’S RESPONSE TO DEFENDANTS’ MAY 11 STATUS REPORT

The original Freedom of Information Act (“FOIA”) request having been served on January 3, 2018, and a complaint before this case filed on January 15, 2018, ECF No. 1, Defendants have regrettably done what Freedom Watch, Inc. (“Freedom Watch”) and the undersigned counsel predicted. In this regard, Defendants cleverly want to drag out and slow roll production of documents, which by any stretch of the imagination cannot be exempt under FOIA, as they concern communications with the media and are likely to reveal grand jury leaks and other improper disclosure of information by the special counsel in its Russian collusion and related investigations.

Rather than simply produce them, after five (5) months of delay, Defendants propose to take two (2) more months, until July 9, 2018, which will be seven (7) months after the original FOIA request was served ECF No. 1, Ex. 1, to even begin so called “rolling production.” This rolling production will obviously result in “dribbles” of benign documents being produced initially and then the rest stretched out over great time.

That Defendant then also proposes to file a “status report within (14) days following the first rolling production and every sixty days thereafter” “tells the tale” of their motivations, which is obviously to slow roll production so few if any meaningful communications with the media are produced until well after the special counsel completes his Russian collusion and related investigations, indicts more defendants, perhaps even the president and other persons, and/or writes his expected “impeachment report” to Congress.

The public has a right to have these documents timely, not a year or years from now, well after the fact. They will likely show improper leaks of grand jury and other information and even bear on a related case before your honor involving Ret. General Michael Flynn, who many feel has been harmed by media leaks by the special counsel and his staff regardless of any alleged wrongdoing.

This is a simple case and Freedom Watch intentionally structured it this way. The undersigned counsel respectfully requests that this honorable court hold a status conference to discuss accelerating production as he admirably did in a case years ago with this same undersigned counsel concerning the Cheney Energy Task Force, which like this one was a matter of great public interest.

In short, with the immense resources of the Defendants, full production can and should proceed quickly and be completed in one (1) month at most, as the public has a right to know what has occurred with media leaks, which continue nearly every day.

Dated: May 14, 2018

Respectfully submitted,

/s/ Larry Klayman
Larry Klayman, Esq.
Freedom Watch, Inc.
D.C. Bar No. 334581
2020 Pennsylvania Ave, NW
Suite 345

Washington, DC, 20006
Tel: (310) 595-0800
Email: leklayman@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of May, 2018, a true and correct copy of the foregoing was filed and served via CM/ECF to all counsel and parties of record.

/s/ Larry Klayman