

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

_____)	
NATIONAL SECURITY COUNSELORS,)	
)	
Plaintiff,)	
)	
v.)	No. 1:11-cv-00443 (BAH)
)	
CENTRAL INTELLIGENCE AGENCY,)	
)	
Defendant.)	
_____)	

**DEFENDANT’S OPPOSITION TO PLAINTIFF’S MOTION
FOR A STATUS CONFERENCE**

Plaintiff National Security Counselors (“NSC”) has moved for a status conference because Defendant Central Intelligence Agency (“CIA”) is providing him with documents responsive to his Freedom of Information Act (“FOIA”) request in paper form, rather than in the electronic format he has requested. Dkt No. 15. The FOIA states that “an agency shall provide the record in any form or format requested by the person *if the record is readily reproducible by the agency in that form or format.*” 5 U.S.C. § 552(a)(3)(B) (emphasis added). The CIA has determined that the documents responsive to NSC’s FOIA request are not readily reproducible in an electronic format. If NSC wants to challenge the CIA’s determination, it may do so at the summary judgment stage. Accordingly, a status conference on this issue is unnecessary.

Dated: December 2, 2011

Respectfully submitted,

TONY WEST
Assistant Attorney General

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/s/ Ryan Parker
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