UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

US RIGHT TO KNOW, Plaintiff, v. CENTRAL INTELLIGENCE AGENCY, Defendant.	Civil Action No. 25-2144 (TJK)

JOINT STATUS REPORT

Consistent with the Court's Minute Order dated September 13, 2025, Plaintiff US Right to Know ("USRTK") and Defendant Central Intelligence Agency ("CIA") (together "Parties"), by and through undersigned counsel, hereby respectfully submit this Joint Status Report ("JSR").

This is a case under the Freedom of Information Act ("FOIA"). It pertains to Plaintiff's FOIA request made on or about May 24, 2025.

Plaintiff's Position

1. Generally, Plaintiff requested, on an expedited basis, records related to the latest assessments made by the CIA regarding the origins of the COVID-19 pandemic ("Pandemic"). CIA initially denied Plaintiff's request for expedited processing of the request but since the last JSR the CIA has reversed its position and granted Plaintiff expedited processing.

2. Plaintiff notes and appreciates the fact that the CIA has reversed its position and granted Plaintiff's position on expedited processing. However, Plaintiff takes issue with the fact that over seven months after Plaintiff made its FOIA request it still has received no information

whatsoever on the nature of the search being conducted by the CIA,[1] the number of records responsive to the request, the number of page counts for those records, and any exemptions or withholdings being claimed. Plaintiff finds that this situation is inconsistent with the acknowledged urgent nature of Plaintiff's request. Plaintiff furthermore takes issue with the fact that the delays have not been explained. Plaintiff thus respectfully requests that this Court order the CIA to complete its search and issue at least a preliminary response to Plaintiff's request within 30 days and further and respectfully requests that this Court, set JSR reporting deadlines at 6-week intervals consistent with the acknowledged urgent nature of Plaintiff's request.

Defendant's Position

Defendant has begun its initial search for documents responsive to Plaintiff's FOIA request and has expedited the processing of this request.

Plaintiff's requests for more "information" do not make sense given the posture of the case. Defendant would not know the number of the records responsive to the request, the number of page counts for those records, and any exemptions or withholdings being claimed until the search is complete.

Additionally, the federal government was shut down due to a lapse in appropriations from October 1, 2025, through November 12, 2025. During this 43-day shutdown period, the Agency was only permitted to work on certain matters that fell within those authorized by the Anti-Deficiency Act, 31 U.S.C. §1341. This FOIA case was not a matter that fell within those parameters. Upon passage of the Continuing Resolution, which funded the government and

[1] Plaintiff also asserts that if it had some information on the nature of the search being conducted that conferences between the Parties might be productive and allow them to better address any potential bottlenecks in the processing of its request.

enabled it to re-open, the Agency's FOIA activities, including this case, resumed on November 13, 2025.

Plaintiff's schedule for a "preliminary response" is arbitrary. Defendant anticipates providing an update on the status of the initial search on or before March 5, 2026.

Dated: January 12, 2026

Respectfully submitted,

By: /s/ Nathaniel M. Lindzen
Nathaniel M. Lindzen, MA Bar No. 689999
Law Office of Nathaniel M. Lindzen
57 School Street
Wayland, MA 01778
Phone: (212) 810-7627
Email: nlindzen@corpfraudlaw.com

Counsel for Plaintiff

JEANINE FERRIS PIRRO
United States Attorney

By: */s/ Brian J. Levy*
BRIAN J. LEVY
Assistant United States Attorney
601 D Street, N.W.
Washington, DC 20530
(202) 252-6734
Brian.Levy2@usdoj.gov

Attorneys for the United States