

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

HISTORY ASSOCIATES INCORPORATED,

Plaintiff,

v.

FEDERAL DEPOSIT INSURANCE  
CORPORATION,

Defendant.

Case No. 1:24-cv-1857-ACR

**JOINT PROPOSED ORDER**

Consistent with the Court's instructions at the May 29, 2025 hearing and in the May 29, 2025 minute order, it is hereby ORDERED that:

1. By **July 7, 2025**, the FDIC shall: (1) produce to History Associates any remaining policies regarding FOIA responses, any written training materials from the last 3 years, and the documents requested by History Associates on June 2, 2025; and (2) file an affidavit attesting that the agency followed the Court's three instructions in the May 29, 2025 minute order and outlining what it found.
2. By **July 9, 2025**, the FDIC shall file its motion to dismiss and/or motion(s) for summary judgment.
3. By **July 30, 2025**, History Associates shall file: (1) its opposition to the FDIC's motion(s) and/or any cross-motion for summary judgment, or (2) a Rule 56(d) motion for discovery on Count II. If History Associates files a Rule 56(d) motion on Count II, the remaining briefing schedule on the FDIC's dispositive motion(s) shall be suspended pending resolution of the Rule 56(d) motion by the Court. The briefing schedule on any Rule 56(d) motion shall be governed by LCvR 7.
4. By **August 13, 2025**, the FDIC shall file its reply brief in support of its dispositive motion(s) and/or opposition to any cross-motion for summary judgment filed by History Associates.
5. By **August 27, 2025**, History Associates shall file its reply brief in support of any cross-motion for summary judgment.

SO ORDERED:

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Date

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HON. ANA C. REYES  
United States District Judge