UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

JOHN EAKIN,	§	
	§	
Plaintiff,	§	
	§	
v.	§	No. SA-16-CV-972-RCL
	§	
UNITED STATES DEPARTMENT	§	
OF DEFENSE,	§	
	§	
Defendant.	§	

JOINT STATUS REPORT

As directed by the Court (*see* ECF No. 112), the parties conferred via telephone to discuss a proposed production schedule for Individual Deceased Personnel Files (IDPFs) belonging to service members with last names beginning with M through Z. Records maintained by the Army Human Resources Command FOIA/PA Office indicate that there are approximately 164,260 such IDPFs remaining to be reviewed in response to the FOIA requests at issue in this litigation.

During their telephonic conference, the parties were unable to reach agreement on a proposed schedule to present to the Court. Plaintiff requests that Defendant be ordered to produce all remaining IDPFs within thirty (30) days of the date of this filing. Defendant requests that it have until December 15, 2023, to produce all remaining IDPFs, and proposes an initial production on or before June 15, 2022, followed by additional productions at six-month intervals. The parties will be prepared to discuss their respective proposals at the upcoming status conference.

Dated: March 14, 2022 Respectfully submitted,

/s/ John Eakin
John Eakin
9865 Tower View
Helotes, Texas 78023
210-695-2204
jeakin@airsafety.com

Plaintiff, Pro Se

ASHLEY C. HOFF United States Attorney

By: /s/ Thomas A. Parnham, Jr.
THOMAS A. PARNHAM, JR.
Assistant United States Attorney
New York Bar No. 4775706
903 San Jacinto Blvd, Suite 334
Austin, Texas 78701
(512) 916-5858 (tel)
thomas.parnham@usdoj.gov

Attorneys for Defendant

JOINT STATUS REPORT 2