

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

CATO INSTITUTE,

Plaintiff,

v.

UNITED SPECIAL OPERATIONS  
COMMAND, et al.,

Defendants.

Civil Action No. 25-1719 (RC)

**JOINT STATUS REPORT**

Pursuant to the Court's December 2, 2025, Minute Order, Plaintiff Cato Institute and Defendants Office of the Secretary of Defense/Joint Staff, United States Northern Command, United States Transportation Command, United States Special Operations Command, and United States Department of Defense, respectfully submit this Joint Status Report.

This case is about four FOIA requests submitted by Plaintiff.

With respect to the April 21, 2025, FOIA request to the Office of the Secretary of Defense/Joint Staff, searches have been tasked out and are ongoing with several Department of Defense components. One component has indicated that it is currently reviewing search results for responsiveness and will deduplicate the results. As searches are completed, Office of the Secretary of Defense/Joint Staff components will review the results, if any, for responsiveness and process the records for release to the Plaintiff.

With respect to the April 21, 2025, FOIA request to the United States Northern Command, searches remain ongoing, and Northern Command estimates it can provide an update to Plaintiff by February 20, 2026.

With respect to the April 22, 2025, FOIA request to the United States Transportation Command, Defendants are conducting a legal review before sending a final response letter. Plaintiff reports that he has asked Transportation Command when the legal review will be completed.

With respect to the April 22, 2025, FOIA request to United States Special Operations Command, Defendants sent a letter on August 7, 2025, stating that no responsive records were found.

For these reasons, the parties request that the Court order the parties to file a joint status report on or before Thursday, April 2, 2026.

Dated: February 2, 2026

Respectfully submitted,

By: /s/ Merrick Wayne

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**PROPOSED ORDER**

UPON CONSIDERATION of the parties' Joint Status Report, and the entire record herein,  
it is hereby

ORDERED that Defendants' obligation to file an answer to any Amended Complaint is  
hereby stayed; and

ORDERED that the parties shall file a joint status report on or before February 2, 2026.

SO ORDERED:

\_\_\_\_\_  
Date

\_\_\_\_\_  
United States District Judge