

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

LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER
LAW,

Plaintiff,

v.

PRESIDENTIAL ADVISORY COMMISSION ON
ELECTION INTEGRITY et al.,

Defendants.

Civil Action No. 1:17-cv-
01354-CKK

**PROPOSED ORDER GRANTING PLAINTIFF LAWYERS'
COMMITTEE FOR CIVIL RIGHTS UNDER LAW'S MOTION TO
COMPEL COMPLIANCE WITH THE COURT'S AUGUST 30, 2017
ORDER AND FOR ADDITIONAL APPROPRIATE RELIEF**

The Court, having considered Plaintiff Lawyers' Committee for Civil Rights Under Law's Motion to Compel Compliance with the Court's August 30, 2017 Order and for Additional Appropriate Relief ("Motion") and any opposition thereto, and finding that good cause appears, orders as follows:

The Motion is hereby GRANTED and it is hereby ORDERED that within 14 days from the date of this Order, Defendants shall file a supplemental *Vaughn* index that individually logs records that were previously categorized, that includes all text messages, and that includes records that pre-date May 11, 2017. In addition, as appropriate relief to address concerns about the completeness of the index, the Court further orders that the Lawyers' Committee may notice up to ___ depositions of Commissioners [AND/OR] Commissioners shall submit declarations regarding their efforts to preserve, collect, and index records related to the Commission.

IT IS SO ORDERED.

Dated: October __, 2017

U.S. DISTRICT JUDGE