

## Exhibit: Status of Agreements and Plaintiff's Narrowing

1. Request One: Communications and records about decision-making for release or transfer.
  - i. There was a prior agreement regarding email records. Email production remains the largest dataset, estimated at approximately 60,000 records. No agreement was reached to narrow the email date range tied to the closure. BOP indicated that it will explore narrowing custodians and search terms and plans to run revised search terms to eliminate irrelevant material; however, BOP has not yet shared this proposal with Plaintiff.
  - ii. Agreement for non-email records: The scope was narrowed to April through June 2024. (Category 1)
2. Request Two: Creation and changes to criteria for transfer or release. Agreement: Plaintiff to follow up. (Category 2)
3. Request Three: Guidance to Wardens and U.S. Attorneys on compassionate release. Agreement: BOP to discuss internally. (Category 3)
4. Request Four: Individual compassionate release records and lists. Clarified Agreement: Narrowed to April–June 2024. (Category 1)
5. Request Five: Case reviews including forms and central file data. Agreement: Narrowed to April 15–May 1, 2024. (Category 3) BOP to check systems. (Category 3)
6. Request Six: Medical reviews and related records. Agreement: Narrowed to April 15–May 1, 2024. (Category 1) BOP to check systems. (Category 3)
7. Request Seven: Grievances related to compassionate release. Summaries released. Plaintiff to follow up for primary source. (Category 2)
8. Request Eight: Communications with immigration authorities. No agreement. (Category 4)
9. Request Nine: Immigration status records. No agreement. (Category 4)
10. Request Ten: Immigration-related grievances. Plaintiff to follow up. (Category 2)
11. Request Eleven: Tort claims for property loss. Agreement: BOP to follow up on whether this is complete, and whether there is an aggregate summary or index. (Category 3) Plaintiff to follow up. (Category 2).
12. Request Twelve: Property-related forms and appeals. Agreement: Plaintiff follow up. (Category 2).
13. Request Thirteen: Grievances related to transfer and closure. Plaintiff follow up. (Category 2).
14. Request Fourteen: Tort claims related to transfer and closure. Plaintiff to follow up. (Category 2).
15. Request Fifteen: Injury assessment forms. Agreement: Records already produced to the Court in CCWP. BOP to follow up. (Category 3)
16. Request Sixteen: Daily staff rosters. Agreement: No agreement. (Category 4) Plaintiff narrowed From April 1 to May 1. Plaintiff to follow up. (Category 2).
17. Request Seventeen: Staff movement and deployment records. Agreement: No agreement reached. (Category 4) Plaintiff narrowed From April 1 to May 1. Plaintiff to follow up. (Category 2).
18. Request Eighteen: Transport records and logs. Agreement: BOP confirmed records exist and are accessible, Plaintiff to further narrow scope. (Category 2)
  - i. Housing unit logs, BOP released in release 11 logs from 2023 it said were responsive “In partial response to Item Numbers 18, 19, 20 and 21 of your request seeking information regarding when inmates were transferred and where, uses of force, records indicating who was working where and when, and investigations and discipline issued” and Plaintiff

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- again stated these were not responsive, and agreed to limit to January 1, 2024 through July 30, 2024.
- ii. Plaintiff to follow up for items other than housing unit logs. (Category 2).
  - iii. bus records. BOP to follow up on. (Category 3) Plaintiff agreed to narrow to 4/1 thru 5/1/24. (Category 1)
19. Request Nineteen: Use of force records. Agreement: Narrowed to April 1 through May 1, 2024, with additional focus on April 15 through May 1. (Category 1)
- i. Housing unit logs, BOP released in release 11 logs from a single housing unit in 2023 it said were responsive "In partial response to Item Numbers 18, 19, 20 and 21 of your request seeking information regarding when inmates were transferred and where, uses of force, records indicating who was working where and when, and investigations and discipline issued" and Plaintiff again stated these were not responsive, and agreed to limit to January 1, 2024 through July 30, 2024.
  - ii. Plaintiff to follow up for items other than housing unit lots. (Category 2).
  - iii. Plaintiff agreed to narrow April 1 to May 1 (Category 1).
20. Request Twenty: Records of staffing and personnel deployment.
- i. Agreement: BOP to review internally how such records are maintained. (Category 3)
  - ii. Housing unit logs, BOP released in release 11 logs from from a single housing unit in 2023 it said were responsive "In partial response to Item Numbers 18, 19, 20 and 21 of your request seeking information regarding when inmates were transferred and where, uses of force, records indicating who was working where and when, and investigations and discipline issued" and Plaintiff again stated these were not responsive, and agreed to limit to January 1, 2024 through July 30, 2024.
  - iii. Plaintiff to follow up for items other than housing unit lots. (Category 2).
21. Request Twenty-One: Investigation and discipline records.
- i. BOP to determine whether aggregate statistics exist and report back. (Category 3)
  - ii. Housing unit logs, BOP released in release 11 logs from 2023 from a single housing unit it said were responsive "In partial response to Item Numbers 18, 19, 20 and 21 of your request seeking information regarding when inmates were transferred and where, uses of force, records indicating who was working where and when, and investigations and discipline issued" and Plaintiff again stated these were not responsive, and agreed to limit to January 1, 2024 through July 30, 2024.
22. Request Twenty-Two: Guidance and training related to closure.
- i. BOP to review internally and follow up. (Category 3)
  - ii. No changes yet to email agreement.
23. Request Twenty-Three: Rationale for closure and transfer. Agreement: No agreement reached. (Category 4)
- i. BOP to review internally and follow up. (Category 3)
  - ii. No changes yet to email agreement.
24. Request Twenty-Four: Training and explanatory materials.
- i. Agreement: No new agreement reached. (Category 4)
  - ii. No changes yet to email agreement.
25. Request Twenty-Five: Document removal certification records. Agreement: BOP to review internally and follow up. (Category 3)
26. Request Twenty-Six: Expenditure records. Agreement: First provide summary documents rather than underlying primary records. (Category 1)

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27. Request Twenty-Seven: Flight data related to transfers. First provide summary documents rather than underlying primary records. (Category 1)
28. Request Twenty-Eight: Bus transport data. First provide summary documents rather than underlying primary records. (Category 1)
29. Request Twenty-Nine: Vehicle transport data including private cars, taxis, and rideshares. First provide summary documents rather than underlying primary records. (Category 1)
30. Request Thirty. First provide summary documents rather than underlying primary records. (Category 1)
31. Request Thirty-One: Daily expense records. First provide summary documents rather than underlying primary records. (Category 1)
32. Request Thirty-Two: Stock records. First provide summary documents rather than underlying primary records. (Category 1)
33. Request Thirty-Three: Contractor inventories. First provide summary documents rather than underlying primary records. (Category 1)
34. Request Thirty-Four: Transit subsidy records. First provide summary documents rather than underlying primary records. (Category 1)
35. Request Thirty-Five: Communications with federal and California elected officials regarding closure and transfer. Agreement: BOP to follow up after obtaining additional information. (Category 3)
36. Request Thirty-Six: Special Master report regarding Dublin. Agreement: Reiterated past agreement. Plaintiff only wants non-public information, not things made public.
37. Request Thirty-Seven: Audit reports including Dublin Task Force, Moss Group, and PREA materials. Agreement: Plaintiff only wants non-public information, not things made public.
38. Request Thirty-Eight: Employee performance appraisals. Agreement: No agreement (Category 4)
39. Request Thirty-Nine: Program reviews and audit responses. Plaintiff follow up (Category 2).
40. Request Forty: Inspections. Agreement: BOP to check whether responsive records exist and follow up. (Category 3)
41. Request Forty-One: Job assignments and pay rates before and after transfer. Agreement: No agreement reached. (Category 4)
42. Request Forty-Two: Conditions at receiving facilities including programs, work, and restitution rates. Agreement: No agreement reached. (Category 4)
43. Request Forty-Three: Placement of former Dublin staff at new facilities. Agreement: BOP to follow up (Category 3)
44. Request Forty-Four: Records retention schedules. BOP stated it completed.
45. Request Forty-Five: Records and photographs provided to the Court regarding transfer. Agreement: BOP to follow up (Category 3)
46. Request Forty-Six: Additional records and photographs provided to the Court regarding transfer updates. Agreement: BOP to follow up (Category 3)
47. Request Forty-Seven: Staffing reports provided to the Court. Agreement: BOP to follow up (Category 3)
48. Request Forty-Eight: Property and transport issue records submitted to the Court. Agreement: BOP to follow up (Category 3)
49. Request Forty-Nine: Disciplinary audit records provided to the Court. Agreement: BOP to follow up (Category 3)

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50. Request Fifty: Transfer videos, including bus footage. Agreement: No agreement (Category 4)