Exhibit C

Facts to Evaluate Reasonableness Through September 30, 2026 Production

This document visualizes BOP's release letter data and quantifies its performance against the obligations imposed by ECF No. 42 and in the 27 months since the request. These metrics can be used to assess reasonableness.[1] From the May 30, 2025 Order through the September 30, 2026 production deadline, 17 monthly obligations accrued at 1,000 pages per month, establishing a benchmark of 17,000 pages reviewed. Plaintiff used BOP's determination letters to identify the number of conventional pages BOP reported reviewing for each monthly production. requirement.

Deficit: From the May 30, 2025 Order through September 30, 2026, 17 monthly obligations accrued, establishing a 17,000-page benchmark. BOP's determination letters quantify 11,598 conventional pages reviewed toward those obligations, leaving 5,402 pages, or approximately 31.8% of the benchmark, not presently accounted for in conventional page terms. Because BOP also processed 29 multi tab spreadsheets for which no agreed page equivalent has been established, Plaintiff does not assert that 5,402 pages is the final processing deficit. The figure must be adjusted to provide BOP appropriate credit for those spreadsheets.[2]

Lateness: BOP's production history also reflects repeated untimely compliance. Comparing each production with its applicable deadline under ECF No. 42, 10 of the 17 monthly obligations, or approximately 58.8%, were not satisfied by the Court ordered deadline. These measures permit the Court to evaluate reasonableness based on BOP's demonstrated performance rather than the 1,000-page monthly rate in ECF No. 42 in isolation. BOP's determination letters quantify 11,598 conventional pages reviewed, approximately 68.2% of the 17,000 page benchmark accrued through September 30, 2026. This calculation measures pages reviewed for a release determination, not pages actually released to Plaintiff.

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[1] The reasonableness of compliance with a monthly review rate and adequacy of the search methods are distinct issues under FOIA. ECF No. 42's 1,000-page monthly requirement measures the pace at which BOP reviews records for a release determination. The rolling release letters typically report the number of pages reviewed and the disposition of those pages, but do not provide information necessary to evaluate the search that generated them (custodians, systems, locations, terms, date ranges, or methodology). BOP could review 1,000 pages each month while the search that supplied those pages nevertheless failed to locate the universe of records responsive to Plaintiff's Request. So, of 13,386 conventional pages BOP's letters indicate it reviewed through September 30, 2026, 9,686 pages, about 72.4%, were released in whole or in part, while 3,700 pages, about 27.6%, were not released or cannot presently be accounted for from the determination letters. Each category or request item had different release rates.

[2] If the Court entirely excludes the two 1,000-page obligations associated with the October and November 2025 shutdown, the amount to reconcile would instead be 3,402 pages before crediting the spreadsheets.

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Key

1. Gray, Pre Order Agreed Deadlines

This category quantifies the five rolling production deadlines BOP agreed to in ECF No. 21 before the Court entered ECF No. 42. These deadlines show the pre-order production history and provide context for BOP's performance before the Court imposed the 1,000-page monthly requirement. They are not counted as court-ordered obligations. The December 20, 2024 initial release serves only as the starting point and is not counted among those five deadlines.

2. Blue, Court Ordered Monthly Obligations

This category quantifies the 17 monthly obligations imposed by ECF No. 42 from May 2025 through September 2026. At 1,000 pages per month, those 17 obligations establish the principal benchmark of 17,000 pages against which reasonableness and compliance is measured.

3. Yellow, Court Ordered Obligations Not Satisfied, Outside the Shutdown

This category quantifies the four months in which no production was made satisfying the applicable monthly obligation and the missed month was not associated with the federal shutdown.

4. Red, Court-Ordered Obligations Not Satisfied During the Shutdown Period

This category separately quantifies the two monthly obligations associated with the October 1 through November 12, 2025 federal government shutdown, October 2025 and November 2025. Keeping these months separate allows the Court to evaluate whether and how those two obligations should be treated for curing missed productions.

5. Purple, Production Occurred, but Compliance Cannot Yet Be Quantified

This category quantifies the April 2026 production, when BOP produced 29 multi-tab spreadsheets without providing a page equivalent. Plaintiff therefore does not treat those spreadsheets as zero, but the present record does not establish how much credit they should receive toward the 1,000-page monthly requirement.

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Actual Release No.	Agreed Deadline (ECF 21)	Court-Ordered Deadline (ECF 42)	BOP Transmitted	Days Late	Pgs Reviewed (not released)	BOP Naming Discrepancy	Notes
1	—	—	12/20/24	—	568		First production. Starting point for BOP's agreed upon four-week production schedule. 568 released in full.
2	1/17/25	—	1/24/25	7	51		BOP agreed in the Jan. 9, 2025 Case Management Statement to make rolling releases every four weeks. ECF No. 21 at 2. (released, 51 =24 full, 27 partial)
3	2/14/25	—	2/21/25	7	32		(32 pages released = 10 in full + 22 in part)
4	3/14/25	—	3/21/25	7	650		(650 pages released = 37 in full + 613 in part) Included 32 pages previously produced in Release 2.
5	4/11/25	—	5/1/25	20	487		(486 pages released = 59 in full + 427 in part; 1 duplicate)
	5/9/25	—	None	Never Produced	0		BOP never produced for this missed release.
	—	6/2/25	None	Never Produced	0		May 30, 2025 ECF 42 ordered 1. Review of 1,000 pages, and 2. production on the last day of each month, or the next regular business day if the

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							last day fell on a weekend or holiday.
6	—	6/30/25	6/30/25	0	1,000		Item 11 (323 pages released = 26 in full + 297 in part, out of 326 reviewed) Emails (43 pages released = 2 in full + 41 in part, out of 674 reviewed; 11 withheld, 28 duplicate, 592 nonresponsive)
7	—	7/31/25	7/31/25	0	1,000		Item 11 (313 pages released = 33 in full + 280 in part, out of 313 reviewed) Emails (22 pages released = 0 in full + 22 in part, out of 687 reviewed; 14 duplicate, 651 nonresponsive)
8	—	9/2/25	8/28/25	0	1,001		(381 pages released = 30 in full + 351 in part, out of 1,001 reviewed; 620 nonresponsive)
	—	9/30/25	None	Never Produced	0		Government Shut Down 10/1/25-11/12-/25 1
	—	10/31/25	None	Never Produced	0		Government Shut Down 10/1/25-11/12-/25
	—	12/1/25	None	Never Produced	0		
9	—	12/31/25	12/19/25	0 as to Dec.; 80 days after Sept. deadline	2,021		BOP asserted that this release satisfied both the September and December 2025 production obligations. 2,021 pages released in full.
10-1	—	2/2/26	1/30/26	0	507		(338 pages released = 24 in full + 314 in part, out of 507 reviewed; 70

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							withheld, 1 duplicate, 26 non agency, 72 nonresponsive)
10-2	—	2/2/26	2/3/26	1	509		Combined Release 10 totaled 1,016 pages. (288 pages released = 10 in full + 278 in part, out of 509 reviewed; 73 withheld, 3 duplicate, 142 nonresponsive)
11	—	3/2/26	2/26/26	0	1000		1,000 pages released in part
12	—	3/31/26	3/31/26	0	1000	12th	(21 released in full, 176 in part, 2 withheld in full, 32 pages are entirely duplicative, and 769 pages of emails are entirely non-responsive).
13-1	—	4/30/26	5/5/26	5	193 + 10 spread sheets	12th	BOP stated that this was only "a portion" of the April 2026 production. number released in full or part not established by the determination letter
13-2	—	4/30/26	5/8/26	8	6 spread sheets	12-2	BOP provided no page-equivalent count. Number released in full or part not established by the determination letter
13-3	—	4/30/26	5/11/26	11	13 spread sheets	12-3	BOP provided no page-equivalent count. Number released in full or part not established by the determination letter.
14	—	6/1/26	6/4/26	3	367	13-1	5 pages BOP counted toward page count were released via a DOJ release form 361 process proposed by BOP, not

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							traditional FOIA. (347 pages released = 24 in full + 323 in part, out of 367 reviewed; 20 withheld)
15-1	—	6/30/26	8/7/26	38	564	Email: 14-1 Letter 13-1	BOP's determination letter instead describes the records as a portion of its "July 2026" production. (564 pages released = 157 in full + 407 in part)
15-2	—	6/30/26	8/10/26	41	436	14-2	Combined Releases totaled 1,000 pages. BOP's determination letter calls this the "final production for July 2026." 436 pages released = 27 in full + 409 in part)
16-1	—	7/31/26	8/28/26	28	425	15-1	(425 pages released = 22 in full + 403 in part)
16-1	—	7/31/26	8/31/26	31	575	15-2	(8 pages released = 0 in full + 8 in part, 4 duplicate, 562 nonresponsive)
17		8/31/26	9/30/2026	30	1000	16	"In response to a portion of items 7, 12, 13 17, 18, 19 and 20, staff located 1000 pages of emails.. we determined 5 pages are appropriate for release in full and 995 pages are appropriate for release in part." These are truintel logs 943 pages, rest admin remedies, but came from email and not other systems.
					11,598		Count after ECF No. 42-September 30, 2026

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					13,386		Total Count

*Excludes any page-equivalent count for the multi-tab spreadsheets in Releases 13-1 through 13-3.