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August 29, 2018

Honorable Joel H. Slomsky
United States District Judge
James A. Byrne United States Courthouse
Room 13614
601 Market Street
Philadelphia, PA 19106

Re: Doe I, et al. v. Evanchick (Case 16-cv-6039)

Dear Judge Slomsky:

The purpose of this letter is to apprise the Court of the current state of discovery in response to the Court's inquiry on Wednesday, August 22, 2018, regarding the status of Plaintiffs' pending Motion to Compel.

Counsel for Plaintiffs and Defendant have conferred many times and achieved substantial progress since the conference with the Court on the motion to compel. The deposition of Major Scott Price, who testified as representative on behalf of Defendant, occurred on July 3, 2018. The parties filed with the Court a Joint Stipulation of Facts Not in Dispute on August 7, 2018. Defendant has also responded to additional discovery requests prompted by Major Price's deposition.

At this time, Plaintiffs have been able to narrow their outstanding discovery requests to just two specific items that remain outstanding, and to which Defendant has agreed to provide responsive information.

First, Plaintiffs have requested statistical information regarding Pennsylvania's Instant Check System (PICS), through which background checks are conducted when an individual seeks to purchase a firearm. Plaintiffs requested a breakdown of PICS background check denials by reason for denial, providing the number of applicants denied for each reason such as a Section 302 commitment.

Second, because Defendant's data revealed a remarkable number of individuals who have benefited from an expedited expungement of their Section 302 commitment records, Plaintiffs have requested certain demographic information regarding individuals who have obtained fast-track expungement of their Section 302 commitments within 12 months of their commitment, a remarkably short period of time.

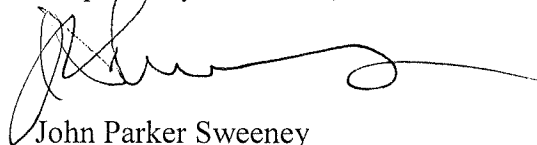
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Defendant has repeatedly promised to provide the above information but has not done so at this time. Defendant last assured us on August 3, 2018, that this information would be forthcoming. On Monday, we reminded Defendants of these outstanding requests after receiving the Court's inquiry but have not heard back.

Once Defendant satisfactorily responds to these outstanding requests, Plaintiffs intend to withdraw their pending Motion to Compel. Plaintiffs will update this Court as soon as they receive additional information from the Defendant or need to press their motion to compel with respect to these two remaining items if that information is not immediately forthcoming.

Thank you for your consideration.

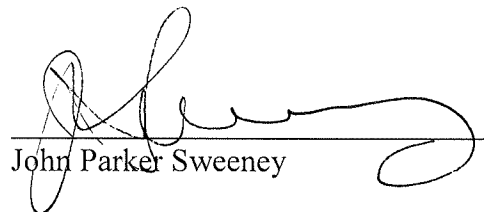
Respectfully submitted,

A handwritten signature in black ink, appearing to read 'John Parker Sweeney', with a long, sweeping horizontal line extending to the right.

John Parker Sweeney
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of August, 2018 copies of the foregoing letter to Honorable Joel H. Slomsky were served, via electronic delivery through the Court's ECF filing system, which will distribute copies to all counsel of record.



John Parker Sweeney