U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

July 16, 2026

BY ECF
The Honorable Dale E. Ho
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Knight First Amendment Institute v. Office of Management and Budget, et al.*, 25 Civ. 8783 (DEH)

Dear Judge Ho:

This Office represents the defendant agencies in this Freedom of Information Act (FOIA) case. We write jointly with counsel for plaintiff to provide a joint status report, as directed by the Court's December 15, 2025 Order, ECF No. 13.

As we noted in our initial letter, the complaint seeks records from three distinct entities for FOIA purposes: (1) the Office of Management and Budget (OMB), and two separate components of the Department of Justice (DOJ): (2) DOJ's Office of Legal Counsel (OLC); and (3) the DOJ's Information Policy (OIP), which, among other things, conducts FOIA operations for DOJ leadership offices.

As previously reported, OMB completed its initial search on December 9, and has been processing the records gathered at a pace of at least 500 pages per month, totaling approximately 3625 pages to date, none of which have been responsive. OMB also conducted a supplemental search based on discussions with plaintiff. The parties have continued to confer about OMB's search given the non-responsiveness of the results so far. Based on these discussions, OMB has paused processing its search results.

OIP previously issued its final response to plaintiff's request. Since the last status report, the parties have conferred about the processed records, and intend to continue doing so.

As we previously noted, shortly after receiving the request, OLC completed a search, and provided plaintiff response on May 30, 2025, indicating it had found no records. Since the last status report, the parties have conferred about OLC's search based on the results of OIP's search. Based on these discussions, OLC plans to conduct a targeted supplemental search.

Under the Court's standing order for status reports, ECF No. 13, the parties' next report will be due August 17, since August 16 is a Sunday.

We thank the Court for its attention to this matter.

Respectfully submitted,

JAY CLAYTON
United States Attorney
Southern District of New York

By: */s/ Peter Aronoff*
PETER ARONOFF
Assistant United States Attorney
Telephone: (212) 637-2697
E-mail: peter.aronoff@usdoj.gov
Counsel for defendants

cc: Counsel for plaintiff (via ECF)