MEMO ENDORSED

U.S. Department of Justice

United States Attorney
Southern District of New York

---

86 Chambers Street
New York, New York 10007

May 6, 2025

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 05/06/2025

BY ECF
The Honorable Andrew L. Carter, Jr.
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2203
New York, NY 10007

Re: *Knight First Amendment Institute v. U.S. Dep't of Homeland Security et al.*, No. 17 Civ. 7572 (ALC)

Dear Judge Carter:

I represent Defendants (the "government") in the above-referenced FOIA action and write respectfully on behalf of all parties in the above-referenced FOIA action to provide a status update. As noted in our last status report, Plaintiff has reviewed all of the draft Vaughn indexes provided by the government and determined that it will not raise any additional challenges to the government's asserted FOIA exemptions. Therefore, the only remaining issue is attorneys' fees and costs. Plaintiff is continuing to prepare a demand and supporting documentation for the government's consideration. To allow the parties to discuss a potential resolution of this issue without the Court's intervention, the parties respectfully propose to file a further status update by July 10, 2025.

I thank the Court for its attention to this matter.

Respectfully,

JAY CLAYTON
United States Attorney

By: */s/ Peter Aronoff*
PETER ARONOFF
Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, NY 10007
Tel: (212) 637-2697
Email: peter.aronoff@usdoj.gov

SO ORDERED:
HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE
May 6, 2025
New York, NY

cc: Counsel for Plaintiff (by ECF)