U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 15, 2026

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 to provide a status update, as required by the Court's April 14, 2026 order, ECF No. 265. As we have previously noted, the only remaining issue is attorneys' fees and costs. In early December, plaintiff provided a demand to the government along with supporting documentation. The parties have engaged in discussions about the demand over the past several months, and they have now narrowed their discussions to settlement at a specific dollar figure. In order to allow the parties to discuss the prospect of consensual settlement, the parties respectfully propose to file a further status update within two months, or by August 13, 2026.

I thank the Court for its attention to this matter.

Respectfully,

JAY CLAYTON
United States Attorney

By: */s/ Peter Aronoff*
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cc: Counsel for Plaintiff (by ECF)