U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

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September 12, 2025

BY ECF
The Honorable Colleen McMahon
United States District Judge
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

OK

Re: *Knight First Amendment Institute v. Central Intelligence Agency, et al.*, 22 Civ. 1542 (CM)

Colleen McMahon 9/29/2025

Dear Judge McMahon:

This Office represents the defendant agencies in this Freedom of Information Act (FOIA) case. We write jointly with counsel for plaintiff to provide a status report, as directed by the Court's previous order, ECF No. 71. As we noted in previous status reports, the parties agree that the merits of this action are now resolved, and the only remaining issue is plaintiff's claim for attorneys' fees and costs. Plaintiff previously provided time records and supporting information, and the parties have had several substantive discussions about plaintiff's demand. Since the last status report, the parties' counsel have discussed a specific proposal that would resolve the action. The government is now running through a formal approval process to determine whether to accept the proposal. In order to provide sufficient time for the government to complete this process and potentially resolve the matter without litigation, we respectfully propose filing either a stipulation of dismissal or a further status report within one month, or by October 10, 2025.

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)