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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December 10, 2025

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

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

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. 73. We apologize for the lateness of this report. Due to the recent government shutdown, the parties did not properly calendar the revised operative due date for this report.

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. Since the last status report, the parties have completed their negotiations and agreed on a specific figure to resolve plaintiffs' claim. The parties are now preparing a stipulation and proposed order. We respectfully propose filing either a stipulation of dismissal or a further status report within one month, or by January 9, 2026.

We thank the Court for its attention to this matter.

Respectfully submitted,

JAY CLAYTON
United States Attorney
Southern District of New York

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