U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

December 12, 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 to provide a status update, as required by the Court's October 17, 2025 order, ECF No. 259.

As we have previously noted, the only remaining issue is attorneys' fees and costs. Earlier this week, plaintiff provided a demand to the government along with supporting documentation. The government is now evaluating the demand and preparing a response. 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 February 12, 2026.

I thank the Court for its attention to this matter.

Respectfully,

JAY CLAYTON
United States Attorney

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cc: Counsel for Plaintiff (by ECF)