KNIGHT
FIRST AMENDMENT
INSTITUTE
at Columbia University

August 31, 2017

Via ECF and by Fax

The Honorable Naomi Reice Buchwald
United States District Court for the
Southern District of New York
500 Pearl Street, Room 2270
New York, NY 10007-1312

Re: Knight First Amendment Institute, et al. v. Trump, et al., Case No. 17-CV-5205 (NRB)

Dear Judge Buchwald,

The parties in the above-referenced matter write to inform the Court of the status of their negotiations regarding a joint stipulation of facts. Plaintiffs sent Defendants a proposed stipulation on August 17, 2017. Defendants have reviewed the proposed stipulation and believe the proposed approach is broadly workable. Defendants intend to send Plaintiffs a substantive response to the proposed stipulation by Friday, September 1, 2017, for further negotiation. The parties will update the Court regarding the status of these negotiations by next Friday, September 8, 2017.

Respectfully,

/s/ Jameel Jaffer

Jameel Jaffer (JJ-4653)
Katherine Fallow (application for admission pending)
Alex Abdo (AA-0527)
Knight First Amendment Institute at Columbia University
314 Low Library
535 West 116th Street
New York, NY 10027
(212) 854-9600
Jameel.Jaffer@knightcolumbia.org

Counsel for Plaintiffs

Jessica Ring Amunson (*pro hac vice*)
Tassity S. Johnson (*pro hac vice*)
Jenner & Block LLP
1099 New York Avenue, NW,
Suite 900
Washington, DC 20001

CHAD A. READLER
Acting Assistant Attorney General

ERIC R. WOMACK
Assistant Branch Director

/s/ Michael H. Baer
MICHAEL H. BAER
Trial Attorney
U.S. Department of Justice,
Civil Division, Federal Programs
Branch
20 Massachusetts Avenue, NW
Washington, DC 20530
Telephone: (202) 305-8573
Facsimile: (202) 616-8460
E-mail:
Michael.H.Baer@usdoj.gov

Counsel for Defendants