# EXHIBIT A

KNIGHT
FIRST AMENDMENT
INSTITUTE
at Columbia University

March 12, 2018

***Via ECF and Email***

The Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007

**Re:** ***Knight First Amendment Institute v. U.S. Department of Homeland Security, et al.*, Case No. 17-CV-7572 (ALC)**

Dear Judge Carter,

Pursuant to Federal Rule of Civil Procedure 15(a)(2), on March 8, 2018, Defendants' counsel provided written consent for the filing of an amended complaint. Attached hereto as Exhibit 1 is the email reflecting that consent.

Respectfully,

*/s/ Jameel Jaffer*

Jameel Jaffer (JJ-4653)
Alex Abdo (AA-0527)
Carrie DeCell (CD-0731)
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*Counsel for Plaintiff*

*/s/ Catherine Crump*

Catherine Crump (CC-4067)
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*Counsel for Plaintiff*

cc: Ellen Blain, Esq. (via Email)

# EXHIBIT 1

**Subject:** RE: Knight v. DHS et al., 17 Civ. 7572 (SDNY)
**Date:** Thursday, March 8, 2018 at 9:05:53 AM Eastern Standard Time
**From:** Blain, Ellen (USANYS)
**To:** Carrie DeCell

Carrie,
The government consents to plaintiff filing an amended complaint to add ICE as a defendant in connection with the FOIA request at issue. Thanks,
Ellen

Ellen Blain
Assistant United States Attorney
Southern District of New York
86 Chambers Street
New York, New York 10007
Tel. (212) 637-2743
Fax (212) 637-2730

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**From:** Carrie DeCell [mailto:Carrie.DeCell@knightcolumbia.org]
**Sent:** Thursday, March 8, 2018 8:32 AM
**To:** Blain, Ellen (USANYS) <EBlain@usa.doj.gov>
**Subject:** Knight v. DHS et al., 17 Civ. 7572 (SDNY)

Hi Ellen,

Following up on our conversation earlier this week, would you please confirm that the government consents to the filing of an amended complaint in this case?

Thanks very much,

Carrie

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Carrie DeCell
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