EXHIBIT C:

Email from Knight Institute to Counsel for Defendants

(May 18, 2018)

From: **Greg Margolis** greg.margolis@knightcolumbia.org
Subject: Re: CIA correspondence re: Request 2
Date: May 18, 2018 at 4:01 PM
To: Parker, Ryan (CIV) Ryan.Parker@usdoj.gov, Moore, Tamra (CIV) Tamra.Moore@usdoj.gov
Cc: Alexander A Abdo alex.abdo@knightcolumbia.org, Ramya Krishnan ramya.krishnan@knightcolumbia.org

GM

Sorry, forgot to attach the letter. Attached now!

From: Greg Margolis <greg.margolis@knightcolumbia.org>
Date: Friday, May 18, 2018 at 3:56 PM
To: "Parker, Ryan (CIV)" <Ryan.Parker@usdoj.gov>, "Moore, Tamra (CIV)" <Tamra.Moore@usdoj.gov>
Cc: Alexander A Abdo <alex.abdo@knightcolumbia.org>, Ramya Krishnan <ramya.krishnan@knightcolumbia.org>
Subject: CIA correspondence re: Request 2

Hi Ryan and Tamra,

We have an update concerning one of the FOIA requests at issue in the suit we filed on May 11. This week, we received a letter, dated May 11, from the CIA regarding Request 2 from the lawsuit (the request sent December 13, 2017). In the letter, the CIA said it was following up on a March 1, 2018 letter that it sent to us—although we have no record of receiving that letter. Because this case is in litigation, we're not planning on responding directly to the CIA's letter, which we've attached here. We also wanted to let you know our position on the CIA's proposed modifications to our request:

1 - Although we are open to narrowing the timeframe of our request later on, we object for now to the CIA's proposed five-year limitation as to Items 1-3 of the request. We are fine with the CIA prioritizing records from the past five years, but we reserve the right to ask for records beyond that timeframe, depending on the volume of responsive records from the last five years. So you know, we also objected to the CIA's previous proposal to limit its searches to the last year. On January 12, 2018, the CIA proposed limiting Items 1–3 to records "within the past year." On January 24, we followed up, objecting to this limitation and stating that we would be fine with the CIA prioritizing the past year but that we reserved the right to seek records beyond that timeframe. On February 2, the CIA responded, stating (mistakenly) that we had "accepted [its] proposals." On February 16, we responded to reiterate our objection.

2 - We also object to the CIA's proposal to limit its search to "CIA-originated records." The CIA proposed this modification in an earlier request for records (Request 1 from the new lawsuit), and we objected. We are open to considering the CIA's proposal more fully, if the agency wants to explain the need for the limitation, but for now we'd like the agency to process all responsive records within its possession.

Also, if possible, would you mind sending us a copy of the CIA's March 1, 2018 letter because, as I mentioned, we never received it.

Thanks,
Greg

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May 11 CIA letter .pdf