KNIGHT
FIRST AMENDMENT
INSTITUTE
at Columbia University

MEMORANDUM ENDORSED

August 6, 2019

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Via ECF

The Honorable John G. Koeltl
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Freedom of the Press Found. v. Dep't of Justice*, No. 17 Civ. 9343 (JGK)

Dear Judge Koeltl:

Pursuant to the Court's order on July 10, 2019, ECF No. 34, I write on behalf of the parties in the above-referenced case to provide a joint status report in this matter.

In their status report to the Court dated July 8, 2019, the parties proposed that Plaintiffs identify the issues and withholdings they intended to challenge by July 24, 2019, and that the parties file another status report proposing a briefing schedule by August 7, 2019. On July 24, 2019, Plaintiffs provided the government with a list of the issues and withholdings they wished to challenge. That list included withholdings by the Criminal Division of the Department of Justice ("DOJ-Crim") of certain information from sixty-five "request packages" that the agency had withheld in full and described in a draft *Vaughn* index provided to Plaintiffs.*

Following Plaintiffs' communication, DOJ-Crim agreed to consult with the relevant prosecuting offices that submitted the requests in question to determine what of the withheld information could be provided. DOJ-Crim

* This subset relates to requests for authorization made pursuant to 28 C.F.R. § 50.10 (commonly known as the Justice Department's "Media Guidelines") that the draft *Vaughn* indicates were approved.

anticipates that it will take two months to make these inquiries and provide this information to Plaintiffs.*

In light of the above, the parties respectfully request an extension of time to propose a briefing schedule for the documents and issues to be litigated. The parties propose that DOJ-Crim conduct the necessary inquiries and provide Plaintiffs with the results of those inquiries by **October 2, 2019**, and that the parties file a further joint status report in which they will propose a briefing schedule by **October 16, 2019**.

We thank the Court for its consideration of this matter.

Respectfully,

/s/ Ramya Krishnan

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cc: Counsel for Defendants

APPLICATION GRANTED
SO ORDERED
GREGORY H. WOODS
U.S.D.J.

8/21/19

* In the interim, the FBI has also provided the supplemental response that was outstanding as of the parties' previous letter to the Court.