U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

October 16, 2019

BY 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 Foundation et al. v. Dep't of Justice et al.*,
No. 17 Civ. 9343 (JGK)

Dear Judge Koeltl:

Pursuant to the Court's order of August 21, 2019, ECF No. 36, I write respectfully on behalf of the parties in the above-referenced case to provide a joint status report in this matter. As discussed in the parties' previous submissions to the Court, the agencies have completed all of their productions, and have been responding to Plaintiffs' questions regarding those productions. Specifically, the U.S. Department of Justice's Criminal Division provided a response to certain outstanding questions on October 2, and will supplement its response by the end of the month. Given the outstanding response, the parties need more time to decide what issues will be addressed in their upcoming motion practice, and respectfully propose that they file a further status report by **November 7, 2019**, in which they will propose a briefing schedule.

We thank the Court for its consideration of this matter.

Respectfully,

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cc: Counsel for Plaintiffs
By ECF