U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

December 6, 2019

BY ECF
The Honorable Andrew L. Carter, Jr.
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2203
New York, NY 10007

Re: *Knight First Amendment Institute v. U.S. Dep't of Homeland Security et al.*, No. 17 Civ. 7572 (ALC)

Dear Judge Carter:

I write respectfully on behalf of the United States Department of Homeland Security ("DHS"), Department of State ("State"), Citizenship and Immigration Services ("USCIS"), Customs and Border Protection ("CBP"), Department of Justice, Office of Public Affairs ("OPA"), and Department of Justice, Office of Information Policy ("OIP," and collectively, the "government"), defendants in the above-referenced FOIA action, to provide the Court with an update regarding DHS's new searches, pursuant to the parties' joint status report dated October 11, 2019, Dkt. No. 146.

As the Court is aware, DHS voluntarily agreed to conduct a new search for documents responsive to plaintiff's FOIA Request, and after reaching agreement with plaintiff on search terms and scope, DHS completed the searches on August 28, 2019. Dkt. No. 137. Those searches returned more than 120,000 potentially responsive documents. On November 29, 2019, DHS completed a preliminary review of those documents for responsiveness and has determined that 277 pages are responsive and require processing. The parties have agreed that DHS will process and produce the 277 pages by January 15, 2020.

The parties continue to confer regarding the other agencies' searches for documents responsive to Item 1 of plaintiff's FOIA Request, and will provide the Court with a status report during the week of December 9, 2019.

I thank the Court for considering this matter.

Respectfully,

GEOFFREY S. BERMAN
United States Attorney

By: */s/ Ellen Blain*

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cc: Counsel for Plaintiff (by ECF)