U.S. Department of Justice

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July 11, 2022

BY ECF
The Honorable Colleen McMahon
United States District Judge
500 Pearl Street
New York, NY 10007

Re: *Knight Institute v. Central Intelligence Agency, et al.*, 22 Civ. 1542 (CM)

Dear Judge McMahon:

MEMO ENDORSED
7/13/2022

This Office represents the defendant agencies in this Freedom of Information Act (FOIA) case. As required by the Court's June 14, 2022 order, ECF No. 34, we write to provide a status report. As indicated in our last letter, the parties' discussions in the past month have centered on two defendant DOJ components: DOJ's Criminal Division (CRM), and DOJ's Office of Information Policy (OIP).

Criminal Division. The parties agree that the Criminal Division will complete its search for potentially responsive records by September 9. The government will provide plaintiff an update on the status of CRM's search in one month—by August 11. The parties intend to discuss CRM's processing schedule as soon as it is feasible to do so.

DOJ's Office of Information Policy. OIP has completed an initial responsiveness review and is in the process of extracting material from its eDiscovery program for further review and processing. OIP anticipates completing processing and providing its response to the FOIA request by August 31, 2022. Plaintiff has agreed to this timeline.

Proposal. The parties propose that we provide the Court with a further status report by September 16, 2022.

We thank the Court for its attention to this matter.

Respectfully submitted,

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Southern District of New York

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