U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

November 21, 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:

This Office represents the defendant agencies in this Freedom of Information Act (FOIA) case. As proposed in our October 21, 2022 letter, ECF No. 39, we write to provide a status report on the agencies or components that have been engaged in search or processing since the last status report.

DOJ Criminal Division. As discussed in the last letter, CRM has completed a responsiveness review of the records located in its searches. CRM is still completing a deduplication and email threading analysis. This will permit CRM to provide plaintiff a page count that will form the basis for negotiating a processing schedule.

DOJ's Office of Information Policy. OIP has completed the supplemental search discussed in the last letter and is reviewing the material gathered for responsiveness.

FBI. The FBI anticipates releasing a small number of additional pages that have been or will be released in a separate, closely related case, *New York Times v. Department of Justice*, 22 Civ. 1539 (JSR) (S.D.N.Y.). The FBI will release these pages to plaintiff when it makes the release in the *New York Times* case.

Proposal. The parties propose that we provide the Court with a further status report by December 7, 2022, at which time we anticipate either having a negotiated schedule for CRM and OIP or a proposal for resolving any disputes.

We thank the Court for its attention to this matter.

Respectfully submitted,

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