U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

MEMO ENDORSED

April 29, 2024

Via ECF
Honorable Dale E. Ho
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Knight First Amendment Institute at Columbia Univ. v. U.S. Dep't of State et al.*, 22 Civ. 3003 (DEH)

Dear Judge Ho:

This Office represents defendants the U.S. Department of State ("State"), the U.S. Department of Homeland Security ("DHS"), and the Office of the Director of National Intelligence ("ODNI"; collectively with State and DHS, "Defendants" or the "Agencies") in the above-referenced case brought by plaintiff Knight First Amendment Institute at Columbia University ("Plaintiff") pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552.

We write respectfully on behalf of both parties to provide a status update pursuant to the Court's order dated April 1, 2024, Dkt. No. 43.

As anticipated in the Agencies' previous status report, Dkt. No. 42, on April 2, 2024, ODNI completed its response to Plaintiff's FOIA request with a final production of records that were subject to consultations. The Agencies have all now completed their responses to Plaintiff's FOIA request.

Plaintiff's counsel advises that, at this time, Plaintiff's review of Defendants' withholdings remains ongoing. Accordingly, the parties respectfully propose to provide another status update within 30 days. This will provide an opportunity for Plaintiff's continued review, as well as for the parties to confer regarding outstanding issues regarding the productions to date. If there are disputes remaining following the parties' discussions, the parties plan to confer regarding a proposed briefing schedule to resolve those issues.

We thank the Court for its consideration of this matter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Samuel Dolinger
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cc: Counsel of record (via ECF)

Application **GRANTED**.

The parties shall provide a status update within 30 days.

SO ORDERED.

Dale E. Ho
United States District Judge
Dated: April 30, 2024
New York, New York