U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, NY 10007

July 28, 2023

BY ECF
The Honorable Paul A. Crotty
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Knight First Amendment Institute at Columbia University v. U.S. Department of State*, No. 23 Civ. 02513 (PAC)

Dear Judge Crotty:

We write jointly on behalf of Defendant the United States Department of State (the "State Department" or the "Government") and Plaintiff the Knight First Amendment Institute at Columbia University (the "Institute"), pursuant to Your Honor's May 31, 2023 Order, ECF No. 15, to provide a status report in the above referenced Freedom of Information Act ("FOIA") matter.

The State Department has completed its search for records potentially responsive to Plaintiff's FOIA Request and identified approximately 216 potentially responsive records, including 16 Excel files. These documents are estimated to total 194,189 pages[1] or 1,633 pages excluding the Excel files.

The State Department is in the process of reviewing these records. However, it was unable to make its initial production on July 21 due to the fact that more of the records than originally anticipated require internal clearances and/or submitter review, which adds to processing time.

The parties have agreed that the State Department will endeavor to make its first production on August 4, and will continue making rolling productions every six weeks thereafter. The parties respectfully request to submit their next joint status report to the Court on September 28, 2023.

[1] Due to the manner in which the software counts pages of Excel files, the number of estimated pages for the Excel files may be significantly greater than the actual page count.

We thank the Court for its consideration.

Respectfully,

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United States Attorney

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