U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

February 20, 2026

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," and collectively with State and DHS, 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.

I write respectfully on behalf of the parties to provide a joint status update pursuant to the Court's order directing the parties to provide a status update every 60 days until otherwise ordered. *See* Dkt. No. 59.

As noted in the parties' last joint status report dated December 22, 2025, Dkt. No. 64, Plaintiff previously requested additional information from the Agencies concerning certain withholdings from the records produced in response to Plaintiff's FOIA request, and subsequently sent follow-up questions. The Agencies have provided responses to all of Plaintiff's questions at this time.

Additionally, as noted in prior status reports, following discussions between the parties, DHS referred Plaintiff's FOIA request to the following DHS components: U.S. Immigration and Customs Enforcement ("ICE"), the Transportation Security Administration ("TSA"), U.S. Customs and Border Protection ("CBP"), and U.S. Citizenship and Immigration Services ("USCIS"). As previously noted, CBP completed its response on March 31, 2025; TSA completed its response on June 17, 2025; ICE completed its response on September 24, 2025; and USCIS completed its response on December 8, 2025.

Plaintiff's counsel advised that they are in the process of reviewing the productions and narrowing down any challenges to withholdings by the Agencies. Moreover, if Plaintiff identifies specific challenges, the parties expect to confer further to determine whether those challenges can be resolved or narrowed.

Accordingly, pursuant to the Court's order, Dkt. No. 59, the parties propose to provide another status update in 60 days, by April 21, 2026, as to what, if any, further steps are necessary in this action.

We thank the Court for its consideration of this matter.

Respectfully submitted,

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cc: Counsel of record (via ECF)