U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 22, 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' previous joint reports, the Agencies have completed processing records and have made productions of responsive, non-exempt records or portions thereof to plaintiff. Plaintiff previously requested additional information from certain Agencies concerning certain withholdings from the records, and subsequently sent follow-up questions, which the Agencies previously responded to. Since the last status report, plaintiff has continued to review the productions and the Agencies' questions to determine whether it intends to challenge any withholdings. The parties also conferred by telephone to discuss certain general questions about the records. 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 August 24, 2026, since August 22 is a Saturday—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)