**U.S. Department of Justice**

*United States Attorney*
*Southern District of New York*

*86 Chambers Street*
*New York, New York 10007*

**MEMO ENDORSED**

May 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.

I write respectfully on behalf of both parties to provide a status update pursuant to the Court's order dated April 30, 2024, Dkt. No. 45.

On May 24, 2024, Plaintiff requested additional information from the Agencies concerning certain of Defendants' withholdings from the records produced in response to Plaintiff's FOIA request. The Agencies are reviewing Plaintiff's request.

The parties respectfully propose to provide another status update within 30 days. This will provide an opportunity for the Agencies to gather additional information and for the parties to confer regarding outstanding issues concerning 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

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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: May 30, 2024
New York, New York