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April 21, 2025

**Via ECF**

U.S. Court of Appeals for the D.C. Circuit
333 Constitution Ave NW
Washington, DC 20001

**Re: Clarification of statement at oral argument**
***Campaign for Accountability v. DOJ***
**Nos. 24-5163, 24-5170**

Dear Judges Srinivasan, Rao, and Pan,

Undersigned counsel writes to clarify a statement made at oral argument. In response to questions by Judge Rao, counsel suggested that the Court could treat Campaign for Accountability's Freedom of Information Act request as one made pursuant to 5 U.S.C. § 552(a)(3). To be clear, the request does not cite § 552(a)(3); it cites only § 552(a)(2). *See* JA 89. The amended complaint likewise characterizes the request as one made pursuant to § 552(a)(2), "not . . . § 552(a)(3)." *See* JA 81. Even if the Court determines that relief here is unavailable under § 552(a)(2), however, it may treat the request as one made pursuant to § 552(a)(3),

because the request satisfies the statutory requirements for requests under that provision, in that it qualifies as "any request for records which (i) reasonably describes such records and (ii) is made in accordance" with the agency's process for receiving FOIA requests.

Respectfully submitted,

/s/ Alex Abdo

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