



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street  
New York, New York 10007*

June 18, 2018

**BY ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2203  
New York, NY 10007

Re: *Knight First Amendment Institute v. U.S. Dep't of Homeland Security et al.*,  
No. 17 Civ. 7572 (ALC)

Dear Judge Carter:

I write respectfully on behalf of Defendant United States Immigration and Customs Enforcement ("ICE"), one of the defendants in the above-captioned Freedom of Information Act ("FOIA") matter, pursuant to the Court's May 23, 2018, Order. Dkt. No. 65.

As the parties previously indicated, ICE located approximately 14,000 pages of documents potentially responsive to Plaintiff's FOIA Request and began producing those documents to Plaintiff on a rolling basis. Dkt. No. 48 at ¶ C(g). As the parties also indicated, Plaintiff provisionally narrowed the FOIA Request, and ICE agreed to re-review the remaining pages it had already identified to determine which, if any, were responsive to the provisionally narrowed Request. Dkt. No. 64 at ¶ B. On May 23, 2018, the Court ordered ICE to, by June 18, 2018, complete its re-review and inform Plaintiff and the Court the resulting number of pages responsive to the narrowed Request. Dkt. No. 65.

ICE has now completed the re-review, and ICE has determined that 99 pages are most likely responsive to the narrowed Request.

We thank the Court for considering this matter.

Respectfully,

GEOFFREY S. BERMAN  
United States Attorney

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