

**KNIGHT  
FIRST AMENDMENT  
INSTITUTE**

at Columbia University

June 22, 2018

*Via ECF and Email*

The Honorable Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, NY 10007

**Re: *Knight First Amendment Institute v. U.S. Department of  
Homeland Security, et al., Case No. 17-CV-7572 (ALC)***

Dear Judge Carter:

Pursuant to the Court's June 22, 2018 Order, ECF No. 69, the Knight First Amendment Institute at Columbia University (the "Knight Institute") respectfully submits this letter in response to the letter filed by U.S. Immigration and Customs Enforcement ("ICE") on June 18, 2018, ECF No. 68 ("ICE Letter"). There, ICE indicated that only 99 pages of records are "most likely responsive" to the Knight Institute's Freedom of Information Act ("FOIA") request (the "Request"), ECF No. 42-2, as provisionally narrowed by the parties. ICE Letter 1. Given this small volume of records, and against the backdrop of ICE's previous proposal to process 750 pages per month, the Knight Institute respectfully requests that the Court order ICE to process and produce all responsive records by June 29, 2018.

In Defendants' April 20, 2018 letter brief, ECF No. 52 ("Defs.' Letter Br."), ICE proposed processing the records it had identified as potentially responsive to the Request—totaling approximately 14,000 pages—at a rate of 750 pages per month. Defs.' Letter Br. 1–2, 6. At that rate, ICE could process 175 pages per week. The Knight Institute therefore believes that affording ICE one week to process only 99 pages is reasonable. Accordingly, the Knight Institute respectfully requests that the Court order ICE to complete its processing and production of all responsive records by June 29, 2018.

Respectfully,

/s/ Carrie DeCell

Carrie DeCell (CD-0731)  
Jameel Jaffer (JJ-4653)  
Alex Abdo (AA-0527)  
Knight First Amendment Institute at  
Columbia University  
475 Riverside Drive, Suite 302  
New York, NY 10115  
carrie.decell@knightcolumbia.org  
(646) 745-8500

*Counsel for Plaintiff*

/s/ Megan Graham

Megan Graham (*pro hac vice*)  
Catherine Crump (CC-4067)  
Samuelson Law, Technology &  
Public Policy Clinic  
U.C. Berkeley School of Law  
354 Boalt Hall  
Berkeley, CA 94720-7200  
mgraham@clinical.law.berkeley.edu  
(510) 664-4381

*Counsel for Plaintiff*

cc: Ellen Blain, Esq. (via Email)