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U.S. Department of Justice

United States Attorney  
Southern District of New York



86 Chambers Street  
New York, New York 10007

February 21, 2020

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

MEMO ENDORSED

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 the United States Department of Homeland Security, Customs and Border Protection, Immigration and Customs Enforcement, Citizenship and Immigration Services, Department of Justice, and Department of State, defendants in the above-referenced FOIA action, regarding the joint status update that the parties proposed to submit today, February 21, 2020, *see* Dkt. No. 150, to respectfully request until February 24, 2020, to submit such a joint status update. Plaintiffs consent to this request.

As the Court is aware, these agencies agreed to conduct a search for documents responsive to Item Number 1 in plaintiffs' FOIA Request. As the parties anticipate outlining in the upcoming joint status report, the parties have reached agreement on the next steps regarding those searches. In light of the number of agencies involved, however, the Government respectfully requests until Monday, February 24, 2020, to review, comment on, and finalize the joint status report.

I thank the Court for considering this matter.

Respectfully,

GEOFFREY S. BERMAN  
United States Attorney

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SO ORDERED:

*Andrew L. Carter, Jr.*  
2-24-20

cc: Counsel for Plaintiff (by ECF)