



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

July 12, 2021

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 both parties in the above-referenced FOIA action to provide a status update regarding supplemental searches to be conducted by United States Immigration and Customs Enforcement ("ICE"). *See* Dkt. No. 181. As the parties previously explained, *see, e.g.*, Dkt. No. 178, the parties have been working diligently to attempt to refine those searches in order to narrow the universe of potentially responsive documents. The parties have now agreed to a revised set of search strings, and will provide a further status update to the Court by August 23, 2021.

I thank the Court for considering this matter.

Respectfully,

AUDREY STRAUSS
United States Attorney

By: /s/ Ellen Blain
ELLEN BLAIN
Assistant United States Attorney
86 Chambers Street, 3rd Floor
New York, NY 10007
Tel: (212) 637-2743
Email: ellen.blain@usdoj.gov

cc: Counsel for Plaintiff (by ECF)