



**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*

December 16, 2022

**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 the government in the above-referenced FOIA action regarding the joint status update due today, December 16, 2022, *see* Dkt. No. 206 & 207, to respectfully request until December 19, 2022, to submit such a joint status update reflecting an agreement that the parties have just reached. I apologize to the Court for the last-minute nature of the request; Plaintiff consents to this request.

As the Court is aware, various defendant agencies and components agreed to conduct a search for documents responsive to Item Number 1 in plaintiff's FOIA Request, and the United States Department of State, Customs and Border Protection, Department of Justice, Homeland Security, and Citizenship and Immigration Services have completed searching, processing and producing responsive documents, if any. *See* Dkt. No. 171. As the parties previously detailed, Immigration and Customs Enforcement ("ICE") and plaintiff agreed on specific search terms; ICE completed those searches and informed the Knight Institute of the initial results; ICE has been processing the documents, and more than 30,000 pages remain; and the parties have continued to revise and review the search parameters to try to narrow the universe of potentially responsive records. *See* Dkt. No. 178. The parties have now reached an agreement regarding how to narrow the universe of records. In order to provide the parties time to finalize that agreement, the government respectfully requests until December 19, 2022, to submit the next joint status report. This is the first request for such an extension.

I thank the Court for considering this matter.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney

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cc: Counsel for Plaintiff (by ECF)