



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

January 5, 2023

BY ECF

Hon. Lorna G. Schofield
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *American Civil Liberties Union et al. v. Office of the Director of National Intelligence, et al.*, 18 Civ. 12131 (LGS)

Dear Judge Schofield:

I write on behalf of both parties in the above-captioned FOIA lawsuit to provide a status report, as required by the Court's January 19, 2022 order, ECF No. 85.

As previously noted, the only open issue is Plaintiffs' claim for costs and attorneys' fees. Last month, Plaintiffs provided the government with a demand and time records in support of their claim. Since the last status report, the parties have had a substantive phone conversation to discuss Plaintiffs' demand. The parties plan to continue their discussions to see if it is possible to resolve Plaintiffs' claim consensually.

Because the parties continue to work together productively, we respectfully request that the Court maintain the regular status report requirement.

I thank the Court for its consideration of this matter.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Peter Aronoff
PETER ARONOFF
Assistant United States Attorney
Telephone: (212) 637-2697
Email: peter.aronoff@usdoj.gov

cc: Counsel for Plaintiffs (by ECF)