



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

December 17, 2019

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:

Pursuant the Court's order of April 16, 2019 [Docket No. 35], I write respectfully on behalf of all parties to provide a status report of the productions of defendants Office of the Director of National Intelligence, National Security Agency, Central Intelligence Agency, and Department of Justice (together the "Agencies") in response to the Freedom of Information Act requests at issue.

Since the last status report to the Court on October 16, 2019 [Docket No. 38], the Department of Justice's National Security Division ("NSD") provided an interim response on November 18, 2019, and a supplemental response on November 26, 2019. The Federal Bureau of Investigation ("FBI") also reprocessed and produced one responsive document on November 29, 2019. NSD and FBI withheld portions of these documents pursuant to various FOIA exemptions and statutory authorities, and Plaintiffs reserve their right to challenge these claimed exemptions.

As provided by the schedule set by the Court, the only remaining productions are those of NSD, which are scheduled to occur on February 3, 2020, and April 3, 2020. The parties will continue to make these periodic status report as ordered by the Court.

Respectfully,

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