



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

August 3, 2020

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 respectfully, on behalf of both parties, to inform the Court that the parties have agreed on a renewed processing schedule of the remaining documents responsible to plaintiffs' request under the Freedom of Information Act. First, the Federal Bureau of Investigation ("FBI") has determined that it must reprocess two documents that it previously withheld in full in light of recent disclosures in other documents. It expects to release these reprocessed documents on or before **September 1, 2020**. Further, the Department of Justice's National Security Division expects to complete its processing and production of the remaining outstanding documents in this case (in consultation with FBI and the National Security Agency) by **October 15, 2020**. The agencies note that these expected deadlines may shift due to intervening COVID-related developments that impact their processing capabilities, and they shall notify Plaintiffs and the Court if they believe additional time is necessary.

Once the agencies' productions are complete, the parties will confer about the need for further litigation concerning the adequacy of their searches and the appropriateness of their withholdings. The parties propose that they provide a status report to the Court regarding the need for further litigation on **November 9, 2020**.

I thank the Court for its consideration of this matter.

Respectfully,

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