



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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July 28, 2021

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 with Plaintiffs' consent to request a one-week extension of the time for the parties to propose a processing schedule (either jointly or, if there is no agreement, separately). *See* ECF No. 67. The current deadline is tomorrow, July 29.

As stated in the parties' last letter, *see* ECF No. 66, the National Security Division of the Department of Justice has gathered a set of additional potentially responsive records. Consistent with the Court's last order, NSD "consult[ed] with any agencies that hold equities" in those records before July 16 and made a proposal to Plaintiffs on a timeline for processing them. The government has also shared some further information with Plaintiffs about the records, and the parties have discussed additional narrowing proposals that would reduce the government's remaining processing time.

In order for the government to apply Plaintiffs' narrowing proposals to the set of potentially responsive records and then provide an updated processing timeline for the parties to discuss, we respectfully request that the Court extend by one week—or until August 5, 2021—the time for the parties to either jointly or, if there is no agreement, separately, propose a processing schedule for the additional NSD records.

I thank the Court for its consideration of this matter.

Respectfully,

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United States Attorney

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