



U.S. Department of Justice

*United States Attorney
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*86 Chambers Street
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October 6, 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:

As indicated in our letter filed yesterday, I write on behalf of the government to make a specific request for an extension of the government's first interim processing date set in the Court's August 6, 2021 order, ECF No. 71, which was previously set as October 5, 2021. The government now respectfully requests that the October 5 deadline be extended to November 1, 2021. The government does not seek any other modifications of the August 6 order. Plaintiffs consent to this request.

As noted in the government's letter filed yesterday, the government has been unable to meet the October 5 deadline, in part due to the unavailability of staff with requisite security clearances and the unexpected absence of staff due to COVID-19 illness or quarantine. The additional four weeks will enable the government to meet this interim processing deadline. As noted above, the government does not seek modification of any other dates or provisions of the August 6 order. We therefore respectfully request that NSD's deadline to make a first interim production under the August 6 order be extended from October 5, 2021 to November 1, 2021.

Finally, the parties respectfully suggest that the government's letters of today and yesterday together be considered to fulfill the parties' obligation to file a joint status update by October 8, 2021.

I thank the Court for its consideration of this matter.

Respectfully,

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United States Attorney

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