



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

December 22, 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 on behalf of both parties to respectfully provide a status report on the Item 6 records, as required by the Court's December 13, 2021 order, ECF No. 79.

On Friday, December 17, the government provided Plaintiffs an unclassified index of the Item 6 records. Plaintiffs have reviewed the index and, on Monday, December 20, responded with some questions about specific entries in the index, which the government is now attempting to answer (if possible) to permit Plaintiffs to either narrow or prioritize the government's processing of the Item 6 records. Because the parties' discussions are ongoing, we respectfully propose that we provide a further update by January 13, 2022.

I thank the Court for its consideration of this matter.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney

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cc: Counsel for Plaintiffs (by ECF)