



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

January 13, 2022

**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 in the above-captioned FOIA lawsuit to respectfully request an extension of the time for the parties to propose a revised processing schedule.

Since our last update on December 22, 2021, ECF No. 81, Plaintiffs reviewed the unclassified index of Item 6 records and identified some records that could be excluded from processing. Plaintiffs also asked questions about the Item 6 records, and requested page counts for records in the index; the government answered these questions and gave page counts earlier this week. Based on these discussions, Plaintiffs have agreed to further narrow the records for processing from Item 6, and have also identified certain priorities within the remaining Item 6 records. Somewhat more than 800 pages remain to be processed.

The parties' discussions have been productive, but we have not reached agreement on a processing schedule at this time. We respectfully request a short extension, until **Tuesday, January 18, 2022**, to jointly propose a revised processing schedule. If the parties have not reached agreement at that time, we will instead put forth the parties' respective proposals for resolving any dispute.

Application GRANTED. The parties shall file a joint letter by **January 18, 2022**, proposing a revised processing schedule or setting forth the parties' respective proposals, if there is any dispute.

Dated: January 14, 2022  
New York, New York

**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

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)