

U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street, 3rd floor New York, New York 10007

September 11, 2017

BY ECF

The Honorable P. Kevin Castel United States District Judge United States Courthouse 500 Pearl Street
New York, New York 10007

Re: New York Times Co. v. U.S. Dep't of Justice, No. 17 Civ. 1946 (PKC)

Dear Judge Castel:

We write respectfully on behalf of the parties in the above-referenced matter in order to provide a joint status report, pursuant to the Court's Order dated July 13, 2017 (Dkt. No. 11). As the parties anticipated in their submission dated July 12, 2017 (Dkt. No. 10), the Government completed its initial searches in response to Plaintiffs' FOIA requests by August 31, 2017. Since that date, the parties have been conferring regarding the results of the Government's searches and possible agreements regarding the processing of responsive documents.

In order to allow additional time for these discussions to continue, the parties jointly and respectfully request the Court's leave to submit a further status report on October 3, 2017 (in advance of the conference scheduled for **October 6, 2017, at 10:45 a.m.**). In that status report, the parties anticipate outlining the progress of the case, potential agreements regarding case scheduling, or any disputes that may need to be resolved.

We thank the Court for its consideration of this matter.

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> Respectfully, JOON H. KIM Acting United States Attorney

By: /s/ Rebecca S. Tinio

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cc (via ECF): All counsel of record