



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

September 6, 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 provide a status report, as required by the Court's January 19, 2022 order, ECF No. 85.

Following Plaintiffs' review of the agencies' productions, including the most recent production on July 29, 2022, Plaintiffs raised certain questions regarding the government's productions in this case. In response, the government has provided responses to some of Plaintiffs' questions, and the government is presently working to determine whether it can provide any further information to Plaintiffs. Plaintiffs have requested that the agencies respond to the outstanding issues by September 19, 2022, so that the parties can seek to resolve those open issues prior to the next status report.

Neither side requests any relief from the Court at this time. Both sides believe it would be most efficient for the parties to continue their discussions to determine whether further litigation will be necessary. We respectfully request that the Court maintain, for the time being, the requirement of a monthly status report on the fifth of each month, ECF No. 85.<sup>1</sup>

Application GRANTED. The parties shall continue to file status letters on the fifth of each month.

Dated: September 7, 2022  
New York, New York

LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

<sup>1</sup> The January 19 Order does not specify an end date for this requirement.

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)