



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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

November 15, 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 October 3, 2017 (Dkt. No. 15). The parties last submitted a status report on October 2, 2017 (Dkt. No. 14), stating that the parties had agreed that the Government would provide a response to Plaintiffs' FOIA requests on November 10, 2017, and would also furnish additional information regarding its processing of responsive documents and a possible schedule for future FOIA responses. Since October 3, 2017, the Government did provide a FOIA response on November 10, 2017, and the parties have discussed additional information provided by the Government about the universe of responsive documents to be processed (which now comprises about fifty-four hundred documents totaling between twenty and twenty-five thousand pages).

Per these discussions, the parties have reached additional agreements and jointly and respectfully request the Court's endorsement of the following: (1) the Government will provide additional FOIA responses on December 15, 2017, and January 15, 2018; (2) the Government will provide Plaintiffs with FOIA responses made in other litigations that are also responsive to the FOIA requests in this matter; (3) the parties will confer promptly after January 15, 2018, to discuss the status of this matter and to confer about a plan for moving forward; (4) the parties will submit an additional status report to the Court on January 19, 2018. Furthermore, the parties note that a court conference is scheduled in this matter for **November 30, 2017, at 11:30 a.m.** (Dkt. No. 15). Given the parties' agreements and the continuing progress of the case, the parties jointly and respectfully request that the November 30 conference be adjourned to a date subsequent to January 19, 2018; but the parties would be happy to appear on November 30, if the Court wishes.

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We thank the Court for its consideration of this matter.

Respectfully,
JOON H. KIM
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