



U.S. Department of Justice

United States Attorney  
Southern District of New York

**MEMO ENDORSED**

86 Chambers Street  
New York, New York 10007  
June 16, 2021

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**VIA ECF**

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 10007

Re: *Safe Passage Project v. U.S. Customs and Border Protection, et al.*, 1:21-cv-03288-VEC

Dear Judge Caproni:

This Office represents defendants (collectively, the “government”) in the above referenced Freedom of Information Act (“FOIA”) matter. On behalf of the parties, the government writes to respectfully request that the Court adjourn the initial pretrial conference, currently scheduled for June 25, 2021 at 10:00 am, until August 6 or a date thereafter that is convenient for the Court. The parties also respectfully request that the deadline for the joint letter, currently due on June 17, 2021, be extended to one week prior to the rescheduled conference. This is the parties’ second request for an adjournment of the initial pre-trial conference.

This adjournment is respectfully requested to permit the parties additional time to seek to resolve the FOIA claims raised in this action. Defendant U.S. Citizenship and Immigration Services produced records responsive to plaintiff’s FOIA request on May 24, 2021. Defendant U.S. Customs and Border Protection (“CBP”) anticipates making an initial production of records responsive to part 1 of plaintiff’s FOIA request by June 25, 2021, and a second production of records responsive to part 2 of plaintiff’s FOIA request by July 26, 2021. After plaintiff has a chance to review the two CBP productions, the parties plan to confer regarding next steps.

The parties thank the Court for its consideration of these requests.

Application GRANTED. The initial pretrial conference is adjourned to **August 6, 2021 at 10:00 a.m.** The parties must appear for the conference by dialing 888-363-4749, using the access code 3121171 and the security code 3288. The parties' joint submission is due by **July 29, 2021.**

Respectfully,

AUDREY STRAUSS  
United States Attorney

By: /s/ Rebecca R. Friedman  
REBECCA R. FRIEDMAN  
Assistant United States Attorney  
Tel: (212) 637-2614  
Fax: (212) 637-2686

SO ORDERED.

6/16/2021

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE