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December 27, 2021

Via ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Application GRANTED. The initial conference scheduled for January 5, 2022, is adjourned to **January 26, 2022, at 4:20 p.m.** The parties shall file their joint letter by **January 19, 2022, at noon.** The parties do not need to submit a proposed case management plan and instead shall propose interim and final production deadlines in the joint letter. No further extensions will be granted absent extraordinary circumstances.

Dated: December 28, 2021
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Goodman v. Department of Homeland Security*, No. 21-cv-7813 (LGS)

Dear Judge Schofield:

We represent the Plaintiff in this Freedom of Information Act case. We write on behalf of both parties to request an adjournment of the initial conference currently scheduled for January 5, 2022 (and, correspondingly, the date by which the parties must submit their joint letter in advance of that conference). This is the parties' second request for an adjournment of this conference.

This case concerns a FOIA request Plaintiff filed on August 5, 2021, seeking records concerning the events of January 6, 2021. Specifically, the request sought documents related to a meeting of "fusion centers" on January 4, 2021. As the request explained, fusion centers are "organized and operated by every state and territory. They gather information from a variety of sources, including the Department of Homeland Security's Office of Intelligence & Analysis." Plaintiff filed this action on September 17, 2021, and Defendant answered the complaint on October 25, 2021.

Defendant produced records to Plaintiff on December 15, 2021. The records contained redactions, and two documents were withheld in their entirety. On December 20, 2021, Defendant's counsel provided additional information to Plaintiff's counsel regarding the basis for those withholdings. The parties intend to confer with respect to the withholdings in order to narrow any dispute that may be presented to the Court at the initial conference.

Accordingly, the parties respectfully submit that adjourning the initial conference for approximately three weeks would promote efficiency because the parties will be in a better position to identify for the Court any dispute that remains in this matter. Specifically, the parties respectfully request that the initial conference be adjourned to any day during the week of January 24 except for the afternoon of January 25. This will provide the parties sufficient time to confer regarding the withholdings and then propose next steps to the Court.



The parties thank the Court for its attention to this matter.

Respectfully,

/s/ Michael Linhorst

Michael Linhorst

David A. Schulz

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