



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

---

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

March 30, 2022

**BY ECF**

The Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

Re: *Bonner v. Central Intelligence Agency,*  
No. 21 Civ. 10673 (PAE)

Dear Judge Engelmayer:

This Office represents defendant the Central Intelligence Agency (“CIA”) in the above-referenced Freedom of Information Act (“FOIA”) matter. The parties’ current deadline to submit a joint status report is Friday, April 1, 2022. (ECF No. 11). Respectfully, we write to request a two-week extension of that deadline, to Friday, April 15, 2022. This is the CIA’s first request for an extension of this deadline, and plaintiff Raymond Bonner’s counsel consents to the request.

This matter concerns a FOIA request submitted by plaintiff to the CIA, in which plaintiff seeks “[a]ny diary, notes, notebooks, writings or drawings created by Abu Zubaydah (also known as Zayn Al Abidin Muhammad Husayn) between March 28, 2002, and the date of his transfer to the United States military base at Guantanamo Bay, Cuba.” (Compl. (ECF No. 1) ¶ 13 & Ex. A). In their prior status report dated February 14, 2022, the parties indicated that the CIA anticipated completing its search for potentially responsive records in early March; thereafter, the CIA would propose a processing schedule to plaintiff with the expectation that the parties could jointly propose a schedule in their April 1 status report. (ECF No. 10).

The CIA has completed an initial search for potentially responsive records, which has turned up a large amount of records that require labor-intensive manual review to identify records potentially responsive to the FOIA request, due in part to the fact that the search results include Arabic-language and handwritten content. Given the nature and

volume of these records, this initial review is taking longer than anticipated, and the CIA requires additional time to assess the number of records it will need to process and to determine a workable timeline for doing so. The CIA has also asked whether plaintiff intends to submit a privacy waiver from Abu Zubaydah or his counsel, as plaintiff has done with regard to other FOIA requests. Plaintiff is in the process of seeking such a waiver.

The requested two-week extension will allow the CIA to complete its initial review, and confer with plaintiff on a schedule to present to the Court. The additional time will also allow plaintiff to seek a privacy waiver from Abu Zubaydah. The existence *vel non* of a privacy waiver will have a substantial impact on the CIA's processing.

We thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York


By: /s/ Christopher Connolly

SARAH S. NORMAND  
CHRISTOPHER CONNOLLY  
Assistant United States Attorneys  
86 Chambers Street, 3rd Floor  
New York, New York 10007  
Telephone: (212) 637-2709/2761  
Facsimile: (212) 637-2730  
sarah.normand@usdoj.gov  
christopher.connolly@usdoj.gov

cc: *Plaintiff's counsel* (by ECF)

Granted.

SO ORDERED.

  
\_\_\_\_\_  
PAUL A. ENGELMAYER  
United States District Judge  
3/31/22