



The New York Times  
Company

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April 20, 2022

Application GRANTED. The parties shall  
file a status letter by August 5, 2022.

Dated: April 21, 2022  
New York, New York

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: *The New York Times Company et al. v. United States Central  
Command, No. 21-cv-08297*

Dear Judge Schofield:

I am counsel for plaintiffs The New York Times Company and its reporter Charlie Savage (jointly, “The Times”) in the above-captioned action brought pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. In this action, The Times seeks aerial footage of a strike conducted in Kabul, Afghanistan, on August 29, 2021. Pursuant to the Court’s April 11 order (Dkt. No. 25), I submit this joint letter on behalf of all parties.

I write to advise the Court that the parties have reached an agreement on a schedule for defendant CENTCOM’s processing of records responsive to The Times’s FOIA request. On or before **Monday, August 1, 2022**, CENTCOM will produce any and all nonexempt video footage responsive to the request.

The parties respectfully request permission to provide a status update on Friday, August 5, 2022, as to whether further proceedings will be necessary in the action.

We thank the Court for its consideration of this submission.

Respectfully submitted,

/s/ David McCraw

David McCraw

cc: All counsel of record (via ECF)