



U.S. Department of Justice

*United States Attorney
Southern District of New York*

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

December 7, 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. Federal Bureau of Investigation and Central
Intelligence Agency,*
No. 21 Civ. 2166 (PAE)

Dear Judge Engelmayer:

This Office represents defendants the Federal Bureau of Investigation (“FBI”) and the Central Intelligence Agency (“CIA”) in the above-referenced Freedom of Information Act (“FOIA”) matter. Defendants’ motion for summary judgment is presently due this Friday, December 9, 2022. (ECF No. 38). Respectfully, we write to request an extension of that deadline to Thursday, December 22, 2022. We further request that the deadline for plaintiff’s cross-motion and opposition correspondingly be extended to Thursday, February 23, 2023.¹ This is defendants’ first request for an extension of their briefing deadline, and plaintiff’s counsel consents to the request.

We make this request owing to a medical emergency in AUSA Sarah Normand’s family, which has caused her to be out of the office for an extended period. This has interfered with defendants’ ability to prepare their motion and supporting papers, particularly because defendants intend to submit a classified *ex parte* declaration that can only be reviewed in a secure facility, and AUSA Normand is the attorney assigned to this matter with the necessary clearances to access the *ex parte* declaration. The additional time

¹ At this time, the parties do not seek extensions of the deadlines for defendants’ opposition and reply (Friday, March 10, 2023) and plaintiff’s reply (Friday, March 31, 2023).

will therefore allow defendants to finalize the material necessary to support their motion. As noted above, plaintiff's counsel consents to this request.

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)

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

December 7, 2022