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U.S. Department of Justice

United States Attorney Southern District of New York

86 Chambers Street New York, New York 10007

February 1, 2023

By ECF

Hon. John G. Koeltl United States District Court Southern District of New York 500 Pearl Street New York, NY 10007 APPLICATION GRANTED
SO ORDERED

John G. Koeltl, U.S.D.J.

Re:

Keefe v. Federal Bureau of Investigation, No. 21 Civ. 5450 (JGK)

Dear Judge Koeltl:

This Office represents Defendant Federal Bureau of Investigation ("FBI") in the above-captioned action, which Plaintiff brings pursuant to the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"). I write on behalf of both parties, to provide a status update and request that the status conference scheduled for February 16, 2023, be adjourned.

As noted in our letter correspondence of September 6, 2022, ECF No. 21, the parties resolved their dispute concerning the payment of duplication fees. The FBI continues to process approximately 500 responsive pages each month and, as of today's date, has produced to Plaintiff 5,639 pages of non-exempt records.

Because production remains ongoing, the parties respectfully request that they be permitted to provide a further status update to the Court on or before June 1, 2023 and that, to conserve judicial resources, the status conference scheduled for February 16 be adjourned *sine die*.

We thank the Court for its consideration.

Respectfully submitted,

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

By: <u>/s/ Jessica F. Rosenbaum</u> JESSICA F. ROSENBAUM

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Assistant United States Attorney 86 Chambers Street, 3rd Floor New York, New York 10007 Telephone: (212) 637-2777 E-mail: jessica.rosenbaum@usdoj.gov