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## **U.S. Department of Justice**

United States Attorney
Southern District of New York¶

86 Chambers Street New York, NY 10007

June 20, 2023

BY ECF

The Honorable Valerie Figueredo Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312 Application Granted

Valerie Figueredo, U.S.M.J.

DATED: June 21, 2023

The Clerk of Court is directed to terminate the motion at ECF No. 43.

Re: Safe Horizon, Inc., et al. v. United States Citizenship and Immigration Services, et al., 1:21-cv-02328-LAK-VF

Dear Judge Figueredo:

Defendant United States Citizenship and Immigration Services ("USCIS") and the United States Department of Homeland Security ("DHS") (together the Government") and Plaintiff Safe Horizon, Inc. and Asista Immigration Assistance (together with the Government, the "Parties") respectfully request a one-week extension to filed their joint status report in the above-referenced Freedom of Information Act ("FOIA"), which is currently due today, ECF No. 42.

The parties are in continued discussions about a path forward in this FOIA litigation and need additional time to complete those discussions. Accordingly, the Parties respectfully request a one-week extension, until June 27, to file their joint status report.

We thank the Court for its consideration.

Respectfully,

DAMIAN WILLIAMS United States Attorney

By: /s/ Dominika Tarczynska

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cc: Akiva Shapiro (via ECF) Attorneys for Plaintiffs