



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

October 5, 2023

By ECF

The Honorable Jesse M. Furman
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records et ano. v. United States Department of State*, No.
23 Civ. 1471 (JMF)

Dear Judge Furman:

This Office represents the United States Department of State (the “Government”) in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 522. On behalf of the Government, I write respectfully to request a two-week extension of the October 10, 2023 deadline for the Government to move for summary judgment and to propose the following revised briefing schedule: October 24, 2023: Government’s motion for summary judgment; December 8, 2023: Plaintiffs’ opposition; January 8, 2023: Government’s reply, if any.

This is the first request by the Government for an extension of the briefing schedule. The extension is necessary because this Office has not completed its discussions with the agency, which needs more time to provide requested information. Plaintiffs consent to the requested relief.

I thank the Court for its consideration of this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Joseph A. Pantoja
JOSEPH A. PANTOJA
Assistant United States Attorney
Tel.: (212) 637-2785

cc: Plaintiffs’ Counsel (by ECF)

The Application is GRANTED. The Government's motion for summary judgment is due October 24, 2023, Plaintiffs' opposition is due December 8, 2023, and the Government's reply, if any, is due January 8, 2024. The Clerk of Court is directed to terminate ECF No. 19.

SO ORDERED

A handwritten signature in black ink, appearing to read "Jesse M. Furman".

October 6, 2023