



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

February 2, 2024

By ECF

The Honorable Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Center for Constitutional Rights v. United States Department of Defense et al.*,
23 Civ. 7689 (NRB)

Dear Judge Buchwald:

This Office represents the United States Department of Defense (“DOD”), the United States Department of State (“DOS”), and the United States Department of Homeland Security (“DHS”) (collectively, the “Government”), defendants in this action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”). This case concerns a FOIA request submitted by Plaintiff to DOD, DOS, and DHS pertaining to specific locations where Plaintiff alleges the United States transferred and detained Afghan evacuees (the “FOIA Request”) and seeking records related to alleged transfers, detentions, and locations.

We write jointly with Plaintiff’s counsel to request a four-day extension of the parties’ deadline to submit a joint status report, from Monday, February 12, 2024, to Friday, February 16, 2024. The parties are actively engaged in meeting and conferring on the processing of this FOIA Request and have a meet and confer scheduled for February 12, 2024. The requested extension would allow the parties to meet and confer on February 12, 2024, and provide the Court with the most up-to-date information on the status of this case. This is the parties’ first request for an extension of the deadline to submit a joint status report.

We thank the Court for its attention to this matter.

Respectfully,

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

By: /s/ Elizabeth J. Kim
ELIZABETH J. KIM
Assistant United States Attorney
Tel.: (212) 637-2745

Email: Elizabeth.Kim@usdoj.gov
Counsel for DOD, DOS, and DHS

Application granted.

SO ORDERED.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: February 5, 2024
New York, NY

/s/ Sadaf Doost

SADAF DOOST

J. WELLS DIXON

BAHER AZMY

Center for Constitutional Rights

666 Broadway, 7th Floor

New York, NY 10012

(212) 614-6464

sdoost@ccrjustice.org

/s/ Christopher Godshall-Bennett

CHRISTOPHER GODSHALL-BENNETT

Muslim Advocates

P.O. Box 34440

Washington, D.C. 20043

(202) 873-1550

christopher@muslimadvocates.org

Counsel for Plaintiff