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U.S. Department of Justice
Civil Division, Federal Programs

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By ECF June 29, 2020

The Honorable Alison J. Nathan United States District Judge Southern District of New York Thurgood Marshall Courthouse 40 Foley Square New York, New York 10007

Alin Q. Nother

SO ORDERED 6/30/20

Alison J. Nathan, U.S.D.J.

Re: NAACP Legal Defense & Educational Fund, Inc. v. U.S. Dep't of Justice, No. 18-cv-9363 (AJN)

Dear Judge Nathan:

Pursuant to this Court's memorandum endorsement of June 25, 2020, the parties submit the following joint letter.

## Plaintiff's Position

It is Plaintiff's position that the case should not be closed, as there are further issues to resolve. Although there are currently no disputes between the parties regarding the agency's new search terms, there may be further disputes for the court to resolve, including potential issues with redactions or withholdings in the agency's eventual productions. Plaintiff proposes that <u>parties make status reports</u> to the Court every two months while records are being produced and reviewed.

SO ORDERED

## **Defendant's Position**

Defendant is aware of no current disputes between the parties. Defendant defers to the Court regarding whether this case should be closed. Defendant does not object to providing joint status reports every two months concerning the processing and production of documents.

Respectfully submitted,

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