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May 21, 2014

VIA ELECTRONIC FILING

Honorable Analisa Torres
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: ACLU, et ano. v. National Security Agency, et al.,
No. 13 Civ. 09198 (AT) (MHD)

Dear Judge Torres:

We are counsel for plaintiffs in the above-referenced Freedom of Information Act ("FOIA") lawsuit, and submit this letter on behalf of all parties.

As directed by the Court's so-ordering of an April 18 joint letter of the parties (Dkt. No. 27), the parties hereby request that the Court endorse this letter to set deadlines by when the defendant agencies are to complete any required remaining searches for potentially responsive documents in connection with Plaintiffs' FOIA requests, as those requests have been modified or construed by so-ordered stipulation of the parties (Dkt. No. 30). The parties' agreed-upon deadlines are:

- By no later than **June 20, 2014**, all defendants except the CIA will complete any remaining required searches for potentially responsive documents.
- By no later than **August 8, 2014**, defendant CIA will complete its search for potentially responsive documents.

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Plaintiffs are concerned that the extended deadline requested by the CIA is unnecessarily long and risks undue delay in a final resolution of this litigation, but have agreed to a compromise date in the spirit of cooperation and based upon the CIA's pledge to comply with the June 20, 2014 deadline for identifying a date by which the final processing of documents will be completed, notwithstanding that its initial document search will still be ongoing. The CIA believes that the proposed deadline is reasonable in light of the scope of the searches it must undertake to respond to Plaintiffs' requests.

The parties understand that these deadlines may not be extended except upon a further application to the Court by the party or parties seeking additional time. We thank the Court for its consideration of this matter.

Respectfully submitted,



Jonathan M. Manes
Counsel for Plaintiffs

cc: David Jones
Jean-David Barnea
Assistant United States Attorneys

Alexander Abdo, Esq.
Patrick Toomey, Esq.
David Schulz, Esq.

SO ORDERED.

Dated: May 21, 2014
New York, New York



ANALISA TORRES
United States District Judge