



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

March 24, 2020

BY ECF

Hon. Lorna G. Schofield
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *American Civil Liberties Union et al. v. Office of the Director of National Intelligence, et al.*, 18 Civ. 12131 (LGS)

Dear Judge Schofield:

I write respectfully to inform the Court that the final production in this Freedom of Information Act (“FOIA”) case—which the Department of Justice’s National Security Division is supposed to make on April 3, 2020, *see* ECF No. 35, at 2—will be delayed due to the COVID-19 epidemic. Specifically, the Federal Bureau of Investigation’s Record/Information Dissemination Section (“RIDS”), which is reviewing the documents for the upcoming release, has been effectively closed until at least March 30, since the work of its employees cannot be done remotely as it is done on classified computer systems. At this point we are unable to estimate when the production will be made. Plaintiffs have been informed of this development and consent to the delay. The Government will promptly notify Plaintiffs when RIDS resumes its FOIA processing operations.

The parties further jointly propose that the date for their next scheduled status report, which is currently due on April 17, 2020, *see* ECF No. 35, at 3, be extended until two weeks after RIDS resumes its FOIA processing operations, to give the parties the opportunity to confer on a new proposed timeline for their production.

I thank the Court for its consideration of this matter.

Respectfully,

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