



The New York Times  
Company

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**VIA ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *The New York Times Company v. United States Department of  
Justice, No. 21-cv-06073*

Dear Judge Failla:

I am counsel for plaintiff The New York Times Company (“The Times”) in the above-captioned action brought pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. I submit this letter on behalf of all parties pursuant to the Court’s April 29, 2022 Order (Dkt. No. 17).

Since the parties’ last status update, The Times has received the Department of Justice’s production, which it is currently reviewing. To allow the parties additional time to discuss next steps in this case, including whether cross-motions for summary judgment will be necessary, the parties respectfully request that the Court permit the parties to submit a further status report on Friday, June 10, 2022.

We thank the Court for its consideration of this submission.

Respectfully submitted,

/s/ David McCraw

David McCraw

cc: All counsel of record (via ECF)