



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

20 Massachusetts Ave., NW
Washington, DC 20530

Daniel Halainen
Trial Attorney

Tel.: (202) 616-8101
Fax: (202) 616-8470
daniel.j.halainen@usdoj.gov

September 8, 2017

Via ECF and by Fax

The Hon. Naomi Reice Buchwald
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

SDC SDNY
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Re: *Knight First Amendment Institute at Columbia University, et al. v. Trump, et al.*,
No. 17-cv-5205 (NRB)

Dear Judge Buchwald,

The parties in the above-referenced matter write to update the Court on the status of their negotiations regarding a joint stipulation of facts. The parties have exchanged drafts of a proposed joint stipulation of facts and continue to believe that this approach is broadly workable, although they are still negotiating certain details. The parties will endeavor to file a joint stipulation and propose a briefing schedule by next Friday. If the parties are unable to do so by next Friday, they will propose a schedule for further proceedings.

In addition, in light of these ongoing negotiations, Defendants respectfully request that the deadline for Defendants to file a responsive pleading to the Complaint be extended from September 15, 2017, to September 29, 2017. There have been no previous requests for an extension of this deadline. Plaintiffs do not object to this request. *11*

Respectfully submitted,

the
from
an
Applicant
granted
Name: Lee
Buchanan,
USPTO
9/11/17

Jessica Ring Amunson (*pro hac vice*)
Tassity S. Johnson (*pro hac vice*)
Jenner & Block LLP
1099 New York Avenue, NW, Suite 900
Washington, DC 20001

/s/ Jameel Jaffer
Jameel Jaffer (JJ-4653)
Katherine Fallow (application for adm
pending)
Alex Abdo (AA-0527)
Knight First Amendment Institute
at Columbia University

314 Low Library
535 West 116th Street
New York, NY 10027
(212) 854-9600
Jameel.Jaffer@knightcolumbia.org

Counsel for Plaintiffs

CHAD A. READLER
Acting Assistant Attorney General

ERIC R. WOMACK
Assistant Branch Director

/s/ Daniel Halainen
MICHAEL H. BAER
DANIEL HALAINEN
Trial Attorneys
U.S. Department of Justice,
Civil Division, Federal Programs Branch
20 Massachusetts Avenue, NW
Washington, DC 20530
Telephone: (202) 616-8101
Facsimile: (202) 616-8470
E-mail: daniel.j.halainen@usdoj.gov

Counsel for Defendants