



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*86 Chambers Street  
New York, New York 10007*

February 8, 2021

By ECF

Honorable Paul A. Engelmayer  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Open Society Justice Initiative v. Central Intelligence Agency, et al.*,  
No. 19 Civ. 234 (PAE) (BCM)  
*Open Society Justice Initiative v. Department of Justice, et al.*,  
No. 19 Civ. 1329 (PAE) (BCM)

Dear Judge Engelmayer:

This Office represents the defendants in this action. We write both to provide a status update and to respectfully request, with plaintiff's consent, a further modification of the Court's prior orders requiring production of a Vaughn index regarding "the CIA's report on the killing." *See* December 8, 2020 Opinion and Order at 29, ECF No. 176; December 14, 2020 Order, ECF No. 178 (extending to February 8, 2021 deadline to produce Vaughn index for CIA report).

The government has identified a specific record from the relevant time period which appears to align, based on the subject matter, with the public disclosures identified in the Court's order regarding a CIA report concerning the killing of Jamal Khashoggi. Because of the ongoing process of review the administration is currently engaged in, the government requires additional time to make a final decision about the exemptions applicable to this record. The government believes that thirty days will be sufficient to make this determination. We therefore respectfully request that the Court extend the date for the government to provide a Vaughn index related to the CIA report until Wednesday, March 10, 2021.

We have conferred with plaintiff's counsel about this request. Plaintiff's counsel has consented, but intends to provide an additional response in the next several days.

We thank the Court for its attention to this matter.

Respectfully,

AUDREY STRAUSS  
United States Attorney for the  
Southern District of New York

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cc: All counsel of record (by ECF)