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December 14, 2017

**VIA ECF**

Honorable Katherine B. Forrest  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Brennan Center for Justice, et al. v. Dep't of Justice, et al., No. 17-cv-6335 (KBF)*

Dear Judge Forrest:

We submit this letter on behalf of our clients, Plaintiffs Brennan Center for Justice at New York University School of Law and The Protect Democracy Project (collectively, "Plaintiffs"), in response to the Court's Memorandum Endorsement, Dkt. No. 34, which provides that no "formal briefing" is necessary "if plaintiffs have set forth the arguments they intend to rely on [in their December 7 letter to the Court, Dkt. No. 33]," and directs Defendants to respond by December 22, 2017.

In the interest of efficiency, Plaintiffs agree to forego formal briefing on Defendants' production schedule and rely on their December 7 letter to the Court, Dkt. No. 33, and November 20, 2017 letter to the Court, Dkt. No. 25. Plaintiffs respectfully request leave to file a reply to Defendants' response—which Plaintiffs would be entitled to file under the full briefing option—no later than December 29, 2017. Defendants' counsel objects for unstated reasons to Plaintiffs' request for such a reply.

Plaintiffs thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jeremy M. Creelan  
Jeremy M. Creelan

cc: Assistant United States Attorney Casey Kyung-Se Lee