



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

April 28, 2021

By ECF

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *The New York Times Co. v. Federal Bureau of Prisons*, 20 Civ. 833 (PAE)

Dear Judge Engelmayer:

This Office represents defendant the Federal Bureau of Prisons (“BOP”) in this Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, action brought by plaintiff the New York Times Company (the “Times”) seeking the release of certain records related to Jeffrey Epstein. I write respectfully to seek a two-day extension, from April 30, 2021, to May 4, 2021, to complete the Government’s initial production of records for the Court’s *in camera* review, a one-month extension, from April 30, 2021, to May 31, 2021, of the parties’ time to submit a schedule to the Court concerning remaining records, and a one-month extension, from May 14, 2021, to June 14, 2021, of the deadline for the Government to produce remaining documents for *in camera* review. This is the Government’s first request for an extension of the April 30, 2021, and May 14, 2021, deadlines. The Times consents to these requests.

The Government has made—and continues to make—substantial efforts to comply with the April 30, 2021, *in camera* production deadline, but needs two additional business days to finalize the production. The production involves review by multiple prosecution teams and the BOP, as well as a process of combining the results of the various reviews into a single document reflecting redactions on all applicable grounds. While the review processes have been occurring in parallel and some are complete, the government needs some additional to combine, review and finalize the production before submitting it to the Court. The government anticipates it can complete any remaining review and finalize the production by May 4, 2021.

The reasons for the Government’s request to extend by one month the deadlines to submit a schedule for the production of any remaining documents and to submit such documents is set out in the Government’s *ex parte* and under seal submission filed contemporaneously herewith.

I thank the Court for its consideration of this submission.

Respectfully submitted,

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