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June 8, 2022

The Honorable Analisa Torres
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

VIA E-MAIL

Re: *In re Search Warrant dated November 5, 2021*, 21 MAG 10685

Dear Judge Torres,

In light of the Court’s May 24, 2022 order, ECF No. 80, the Reporters Committee for Freedom of the Press (“Reporters Committee”) hereby respectfully requests that it be granted leave to file a reply in support of its Objections to Magistrate Judge Cave’s Opinion and Order, ECF No. 49 (the “Objections”), no later than fourteen (14) calendar days after service of the Government’s response, which is due on or before June 24, 2022.

Through their counsel, James O’Keefe, Project Veritas, and amicus the American Civil Liberties Union (“ACLU”) have consented to the relief requested herein. Through its counsel, the Government has stated that it has no objection to the relief requested herein.

Background

On November 5, 2021, Magistrate Judge Cave issued a search warrant permitting the Government to seize and extract information from cellular phones found in the home of James O’Keefe, founder of Project Veritas. *See Exhibit A* to Letter-Motion of Reporters Committee, ECF No. 34-1. On November 15, 2021, the Reporters Committee submitted to this Court and to Judge Cave a letter-motion to unseal the application, affidavits, and other documents related to that November 5 search warrant. ECF No. 34-1.

On December 7, 2021, Judge Cave issued an Opinion and Order denying in full the Reporters Committee’s motion. ECF No. 47.

On December 20, 2021, the Reporters Committee filed in this Court its Objections to the Opinion and Order. ECF No. 49. The Government responded to the Reporters Committee’s Objections on January 3, 2022, ECF No. 53, and the Reporters Committee replied on January 5, 2022, ECF No. 54.

On May 13, 2022, the ACLU moved for leave to file an amicus letter in support of the Reporters Committee’s Objections. ECF Nos. 75, 75-1.

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On May 24, 2022, the Court issued an order (1) granting the ACLU's motion for leave to file and (2) instructing the Government to file a consolidated response both to the ACLU's letter and to the Reporters Committee's Objections by June 24, 2022. ECF No. 80.

Relief Sought

The Reporters Committee respectfully seeks leave to file a reply in support of its Objections no later than fourteen (14) calendar days after service of the Government's consolidated response.

Respectfully submitted,

/s/ Katie Townsend

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cc:
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GRANTED in part, DENIED in part. By **July 1, 2022**, the Reporters Committee for Freedom of the Press shall file its reply, if any.

SO ORDERED.

Dated: June 8, 2022
New York, New York



ANALISA TORRES
United States District Judge