

JAMEEL JAFFER  
DEPUTY LEGAL DIRECTOR



July 22, 2016

**BY ECF**

Hon. Colleen McMahon  
United States District Judge  
Daniel P. Moynihan United States Courthouse  
500 Pearl Street, Room 1640  
New York, NY 10067

**Re: *ACLU v. DOJ*, No. 15 Civ. 1954 (CM)**

Dear Judge McMahon:

I write on behalf of the plaintiffs in the above-referenced case to respectfully request that the Court require the government to complete its declassification review of the Court's June 21 ruling by August 5, two weeks from today.

As this Court is aware, the June 21 ruling relates to a matter of exceptional public interest. Public interest in this matter has only increased since the government's limited release of certain casualty information three weeks ago. As the presidential election approaches, it is reasonable to assume that public interest in this matter will increase further. Americans have a right to know what powers the current president will turn over to the next one, and the government records at issue in this Court's June 21 ruling address precisely that question.

While plaintiffs understand that the June 21 ruling is very lengthy and that the declassification review requires a substantial commitment of resources on the part of the government, the government has had the opinion for four weeks already and has declined to make any firm commitment to plaintiffs concerning the completion of the review. In the circumstances, plaintiffs believe it would be appropriate for the court to impose a deadline. Plaintiffs respectfully request that the Court impose a deadline of August 5, which is two weeks from today and six weeks from the date on which the Court's opinion was issued.

Counsel for the government has indicated that the government believes that the declassification review can be completed in "approximately two and a half weeks" but that the government opposes plaintiffs' request that the Court impose a firm deadline.

Respectfully submitted,

/s/ Jameel Jaffer  
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American Civil Liberties Union Foundation

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