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December 4, 2017

VIA ECF

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

Re: *Doyle et al. v. U.S. Department of Homeland Security, et al.*, No. 17-2542 (KPF)

Dear Judge Failla:

Plaintiffs in the above-referenced action, Kate Doyle, National Security Archive, Citizens for Responsibility and Ethics in Washington, and Knight First Amendment Institute at Columbia University, respectfully request that the Court schedule a hearing on Defendants' Motion for Summary Judgment on Plaintiffs' FOIA Claims and Dismissal of Plaintiffs' Remaining Claims (Dkt. 45).

On this date, Plaintiffs have filed their opposition explaining that the records of visitors to the White House and the records of presidential visitors to Mar-a-Lago at issue in this case are agency records of the Secret Service and therefore subject to disclosure under the Freedom of Information Act. Plaintiffs' opposition also explains that their claims under the Presidential Records Act and Federal Records Act are valid and properly subject to judicial review. Plaintiffs respectfully submit that oral argument would assist the Court in resolving Defendants' motion given the significance of these issues, which have not yet been addressed by this District or the Second Circuit.

Respectfully,

/s/ Anne L. Weismann
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cc: Sarah S. Normand (via electronic email)
Elizabeth J. Shapiro (via electronic email)
Brad P. Rosenberg (via electronic email)

The Court is in receipt of Plaintiffs' request for oral argument and shall order such argument when and if the Court would find it useful.

Dated: December 4, 2017
New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE