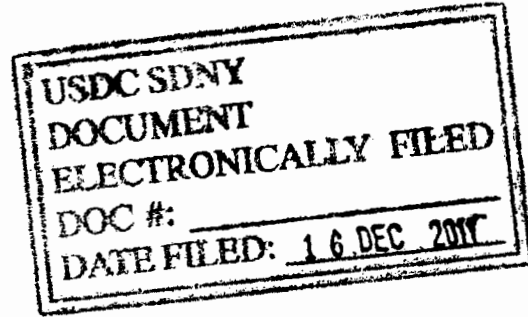


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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
AMERICAN CIVIL LIBERTIES UNION; :
AMERICAN CIVIL LIBERTIES UNION :
FOUNDATION, :

Plaintiffs, :

v. :

FEDERAL BUREAU OF INVESTIGATION, :
UNITED STATES DEPARTMENT OF JUSTICE, :

Defendants. :
----- X

ECF Case

11 Civ. 6398 (LTS)

**FIRST STIPULATION AND
ORDER REGARDING
DOCUMENT SEARCHES BY
THE FEDERAL BUREAU OF
INVESTIGATION**

WHEREAS, on September 14, 2011, Plaintiffs the American Civil Liberties Union and the American Civil Liberties Union Foundation (collectively, "Plaintiffs") filed a complaint for injunctive relief (the "Complaint") pursuant to the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"), naming as one of the defendants the Federal Bureau of Investigation ("FBI");

WHEREAS, the Complaint sought an order requiring, among other things, that FBI search for and process documents responsive to the FOIA request that Plaintiffs submitted to the FBI on March 15, 2011;

WHEREAS, FBI, along with the other defendant, the United States Department of Justice, answered the Complaint on October 17, 2011;

WHEREAS, Plaintiffs and FBI have agreed to a schedule for searching for responsive documents;

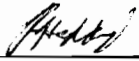
NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among Plaintiffs and FBI as follows:

1. By January 23, 2012, FBI will complete its search for documents that are potentially responsive to Plaintiffs' FOIA Request.
2. Within two weeks of the completion of FBI's search, Plaintiffs and FBI will meet and confer regarding the results of the search.
3. Within three weeks of the completion of the search, Plaintiffs and FBI will submit to the Court a status report (a) stipulating to a consensual schedule for FBI's processing and production of responsive documents, which will be produced in full except to the extent that they are withheld or redacted pursuant to applicable FOIA exemptions; or (b) requesting that the Court set such a schedule.

Dated: December __, 2011
New York, New York

PROSKAUER ROSE LLP
Attorneys for Plaintiffs

PREET BHARARA
United States Attorney for
the Southern District of New York
Attorney for the FBI

By: 

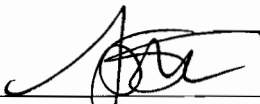
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Date: 12/16/2011

SO ORDERED.



HON. LAURA TAYLOR SWAIN
United States District Judge