

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SOUTHEASTERN LEGAL FOUNDATION, INC.,)	
)	
Plaintiff,)	Case No. 1:23-cv-03819-LMM
)	
v.)	
)	
NATIONAL ARCHIVES AND RECORDS ADMINISTRATION,)	
)	
Defendant.)	

NOTICE

Defendant National Archives and Records Administration (NARA) hereby notifies the Court that the sentence at page 14 of its Brief in Support of its Joint Status Report Position, ECF No. 15, which states that “Plaintiff waited until June 2022 to submit a FOIA request for records from *eight years prior*,” was included in the brief in error. As Plaintiff points out in its Reply Brief, ECF No. 16, under the Presidential Records Act, Vice Presidential records are not subject to Freedom of Information Act (FOIA) requests for a period of five years after NARA either takes custody of the records or completes processing and organization of an integral file segment of the records, whichever is earlier, 44 U.S.C. § 2204(b)(2), which in this case was January 20, 2022. Pl.’s Reply at 10 & Ex. 3. Defendant apologizes for the error.

Dated: February 1, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

MARCIA BERMAN
Assistant Branch Director

/s/ Kyla M. Snow _____

KYLA M. SNOW

Ohio Bar No. 96662

Trial Attorney

U.S. Department of Justice, Civil Division

Federal Programs Branch

1100 L Street, NW

Washington, D.C. 20005

Email: kyla.snow@usdoj.gov

Phone: (202) 514-3259

Fax: (202) 616-8460

Counsel for Defendant