

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**CITIZENS FOR RESPONSIBILITY AND
ETHICS IN WASHINGTON**

1101 K Street, NW, Suite 201
Washington, D.C. 20005

Plaintiff,

v.

**UNITED STATES DEPARTMENT
OF JUSTICE**

950 Pennsylvania Avenue, NW
Washington, D.C. 20530

Defendant.

Civ. Action No. 1:19-cv-03626 (DLF)

DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

The United States Department of Justice (“DOJ”), by and through undersigned counsel, respectfully moves this Court, pursuant to Fed. R. Civ. P. 56 and Local Rule 7(h), to enter summary judgment in DOJ’s favor on all claims in this Freedom of Information Act (“FOIA”) case. This motion is supported by the accompanying Memorandum of Points and Authorities in Support of Defendant’s Motion for Summary Judgment; Statement of Material Facts as to Which There Is No Genuine Dispute; and the Declarations of Kara Christenson and Richard M. Winter of the Federal Bureau of Prisons (with accompanying exhibits) and Vanessa R. Brinkmann of DOJ’s Office of Information Policy. A proposed Order is also attached.

Dated: November 6, 2020

Respectfully submitted,

JEFFREY BOSSERT CLARK
Acting Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Director, Federal Programs Branch

/s/ Jonathan D. Kossak

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Counsel for Defendant, U.S. Department of Justice

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing Motion for Summary Judgment with the Clerk of the Court through the ECF system on November 6, 2020. This system provided a copy to and effected service of this document on all parties.

/s/ Jonathan D. Kossak
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United States Department of Justice
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