

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CITIZENS FOR RESPONSIBILITY AND
ETHICS IN WASHINGTON,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY,

Defendant.

Civil Action No. 23-0046 (AHA)

(Oral Hearing Requested)

**PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT AND OPPOSITION TO
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Plaintiff Citizens for Responsibility and Ethics in Washington ("CREW") respectfully cross-moves for summary judgment. In support of this motion, Plaintiff submits the accompanying memorandum of points and authorities and statement of undisputed material facts. A proposed order is attached.

Pursuant to Local Civil Rule 7(f), Plaintiff requests an oral hearing on this motion.

Date: January 10, 2025

Respectfully Submitted,

/s/ Kayvan Farchadi

Kayvan Farchadi

(D.C. Bar No. 1672753)

Alex Goldstein

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing Plaintiff's Cross-Motion for Summary Judgment and accompanying documents with the Clerk of the Court through the ECF system on January 10, 2025. This system provided a copy to and effected service of this document on all parties.

Date: January 10, 2025

/s/ Kayvan Farchadi

Kayvan Farchadi
D.C. Bar No. 1672753