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
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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