

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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| <p>HERITAGE FOUNDATION, et. al,</p> <p>Plaintiffs,</p> <p>v.</p> <p>DEPARTMENT OF HOMELAND SECURITY</p> <p>Defendant.</p> |
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Civil Action No. 23-1198 (CJN)

MOTION FOR SUMMARY JUDGMENT

Defendant the U.S. Department of Homeland Security respectfully moves the Court for an order granting summary judgment in its favor as to all the claims in this Freedom of Information Act (“FOIA”) suit brought by Plaintiffs the Heritage Foundation and Mike Howell. Any information responsive to Plaintiffs’ request is exempt from disclosure.

In support of this motion, Defendant respectfully refers the Court to the attached memorandum of points and authorities, statement of material facts as to which there is no genuine dispute, and exhibits. Defendant also attaches a proposed order for the Court’s consideration.

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Dated: August 28, 2023
Washington, DC

Respectfully submitted,

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United States Attorney

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