

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

AMERICAN CIVIL LIBERTIES UNION,
et al.,

Plaintiffs,

v.

CENTRAL INTELLIGENCE AGENCY,

Defendant.

No. 18-cv-2784 (CJN)

**PLAINTIFFS' RESPONSE TO DEFENDANT'S
STATEMENT OF MATERIAL FACTS NOT IN DISPUTE**

Pursuant to Local Rule 7(h) and Chambers Rule 10(b), Plaintiffs the American Civil Liberties Union and the American Civil Liberties Union Foundation (together, the "ACLU") respond as follows to the CIA's statement of material facts not in dispute:

1. Admitted.
2. Admitted.
3. Admitted.
4. The ACLU disputes the CIA's legal conclusion that all of its withholdings are exempt from disclosure.
5. Admitted.
6. Admitted.
7. The ACLU disputes the CIA's assertion that it has complied with its obligation to release all reasonably segregable and non-exempt information.

Dated: January 11, 2021

Respectfully submitted,

/s/ Charles Hogle

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