

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION

Plaintiff,

v.

UNITED STATES DEPARTMENT OF  
JUSTICE, including its component the Federal  
Bureau of Investigation

Defendant.

No. 12-cv-7412 (WHP)  
ECF Case

NOTICE OF MOTION

**NOTICE OF PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiff's Cross-Motion for Summary Judgment and in Opposition to Defendant's Motion for Summary Judgment, dated April 19, 2013, plaintiff moves this Court, before the Honorable William H. Pauley, at the United States Courthouse, 500 Pearl St., New York, NY, for an Order granting plaintiff summary judgment and such other and further relief as requested and as the Court deems just and proper in the above-captioned case, pursuant to Rule 56 of the Federal Rules of Civil Procedure.

DATED: April 19, 2013

Respectfully submitted,

/s/ Catherine Crump

Catherine Crump  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad Street, 18th Floor  
New York, NY 10004  
Telephone: 212.549.2500  
Facsimile: 212.549.2651  
Email: ccrump@aclu.org

*Counsel for the plaintiff*

**CERTIFICATE OF SERVICE**

I, Catherine Crump, hereby certify that on April 19, 2013, I caused a copy of the foregoing Notice of Motion to be served upon the counsel for defendant named below by ECF and electronic mail:

Carina H. Schoenberger, Esq.  
Assistant United States Attorney  
86 Chambers Street, Third Floor  
New York, NY 10007  
carina.schoenberger@usdoj.gov

DATED: April 19, 2013

/s/ Catherine Crump  
Catherine Crump