

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

AMERICAN CIVIL LIBERTIES UNION)
FOUNDATION, INC.,)
AMERICAN CIVIL LIBERTIES UNION)
AND)
NATIONAL CONSUMER LAW CENTER)
))
Plaintiffs,)
))
v.)
))
UNITED STATES DEPARTMENT OF)
EDUCATION)
))
Defendant.)

Civil Action No.: 16-10613-ADB
ORAL ARGUMENT REQUESTED

PLAINTIFFS’ CROSS-MOTION FOR SUMMARY JUDGMENT,
OPPOSITION TO DEFENDANT’S MOTION FOR SUMMARY JUDGMENT,
AND REQUEST FOR ORAL ARGUMENT

Pursuant to Fed. R. Civ. P. 56, Plaintiffs hereby move this Court to enter judgment in their favor in the instant action. Plaintiffs rely on their Memorandum of Law filed simultaneously herewith.

Pursuant to Local Rule 7.1(d), Plaintiffs hereby request oral argument in the instant action. Plaintiffs believe that oral argument will assist the Court and wish to be heard.

Respectfully submitted,

/s/ Rachel E. Goodman
Rachel Goodman
Dennis Parker
Sarah Hinger

American Civil Liberties Union
Foundation
125 Broad Street, 18th Fl.
New York, NY 10004
(212) 549-2500
rgoodman@aclu.org

Matthew R. Segal, BBO No. 654489
Rahsaan D. Hall, BBO No. 645369
Jessie J. Rossman, BBO No. 670685
Laura Rótolo, BBO No. 665247
American Civil Liberties Union
Foundation of Massachusetts
211 Congress Street
Boston, MA 02110
(617) 482-3170 ex. 337
jrossman@aclum.org

Stuart Rossman, BBO No. 430640
Persis S. Yu, BBO No. 685951
National Consumer Law Center
7 Winthrop Square, 4th Floor
Boston, MA 02110
(617) 542-8010
srossman@nclc.org

Attorneys for Plaintiffs

LOCAL RULE 7.1 CERTIFICATION

The undersigned counsel asserts that she has not conferred with the Defendant regarding this Motion to narrow the issues. The Parties have already been provided a schedule to submit these papers by the Court.

/s/ Rachel E. Goodman

Rachel E. Goodman

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Rachel E. Goodman

Rachel E. Goodman

Attorney for Plaintiffs

Dated: May 16, 2017