

**COMMONWEALTH OF MASSACHUSETTS**

**SUFFOLK, SS**

**SUPERIOR COURT**

AMERICAN CIVIL LIBERTIES UNION  
OF MASSACHUSETTS, INC.,

Plaintiff,

v.

PLYMOUTH COUNTY SHERIFF'S  
DEPARTMENT,

Defendant.

C.A. No. 2684CV00477

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

Pursuant to Rule 56 of the Massachusetts Rules of Civil Procedure, Plaintiff American Civil Liberties Union of Massachusetts, Inc. ("ACLUM") hereby moves this Court to grant summary judgment in Plaintiff's favor and order Defendant Plymouth County Sheriff's Department to produce the records responsive to ACLUM's December 11, 2025 public records request that were withheld by the Defendant.

In support of this Motion, the Plaintiff files herewith Plaintiff's Memorandum in Opposition to Defendant's Motion to Dismiss and in Support of Plaintiff's Cross-Motion for Summary Judgment, Plaintiff's Statement of Material Facts in Support of Plaintiff's Cross-Motion for Summary Judgment, and supporting affidavits and exhibits. Plaintiff also relies on the exhibits to Defendant's Motion to Dismiss, the authenticity of which Defendant apparently does not contest.

**REQUEST FOR ORAL ARGUMENT**

Plaintiff also respectfully requests oral argument as it may aid the Court in ruling on this Motion.

Dated: May 21, 2026

Respectfully submitted,

*/s/ Mackenzie R. Saunders*

Mackenzie R. Saunders (BBO# 717801)

Daniel L. McFadden (BBO# 676612)

AMERICAN CIVIL LIBERTIES UNION

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*Attorneys for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 21st day of May, 2026, the foregoing document was filed with the Suffolk Superior Court and served via email on counsel for Defendant at:

Jessica Kenny  
Plymouth County Sheriff's Department  
jkenny@pcsdma.org

/s/ Mackenzie Saunders  
Mackenzie Saunders