

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT
CIVIL ACTION NO. 2384CV02560

AMERICAN CIVIL LIBERTIES UNION OF
MASSACHUSETTS, INC.,

Plaintiff,

v.

MASSACHUSETTS STATE POLICE,

Defendant.

PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT

Pursuant to G.L. c. 66, § 10A, Mass. R. Civ. P. 56, Plaintiff American Civil Liberties Union of Massachusetts, Inc. (“ACLUM”) hereby moves for summary judgment against Defendant Massachusetts State Police (“MSP”). As described in the accompanying memorandum of law, MSP has failed to produce requested records responsive to ACLUM’s August 2023 request for public records related to the location and use of automatic license plate reader (“ALPR”) technology in the Commonwealth of Massachusetts. MSP withheld certain records responsive to ACLUM’s request citing Exemptions (b), (f), and (n) of Massachusetts Public records law, G.L. c. 4, §§ 7 Twenty-sixth (b), (f), and (n). These exemptions are inapplicable to the requested records. Accordingly, ACLUM respectfully asks the Court to grant ACLUM’s motion and order release of the subject records.

Respectfully submitted,

American Civil Liberties Union of
Massachusetts, Inc.

By its attorneys,

Dated: January 30, 2026

/s/ Michael A. Albert

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