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

AMERICAN CIVIL LIBERTIES UNION OF MASSACHUSETTS, INC.,	)))	
Plaintiff,	))	
vs.	)))	**Civil Action No. 1:22-cv-11532-DJC**
THE CENTRAL INTELLIGENCE AGENCY, *et al.*,	)))	
Defendants.	)))	

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants the Central

Intelligence Agency ("CIA"), the Office of the Director of National Intellgience ("ODNI"), the

United States Department of Defense ("DoD"), and the National Security Agency ("NSA")

(collectively, "Defendants") respectfully move the Court to enter summary judgment on behalf

of Defendants on Plaintiff's claim pursuant to the Freedom of Information Act ("FOIA"), 5

U.S.C. § 552 *et seq.*, as there are no genuine issues of material fact regarding Defendants'

compliance with the FOIA in responding to Plaintiff's FOIA requests. The accompanying

Memorandum of Points and Authorities more fully sets forth the reasons that support

Defendants' Motion for Summary Judgment.

Dated: February 6, 2023   Respectfully submitted,

                                           BRIAN M. BOYNTON
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ELIZABETH J. SHAPIRO
Deputy Director
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/s/ Julia A. Heiman
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CERTIFICATE OF SERVICE

I hereby certify that this motion, along with accompanying memorandum of points and

authorities, proposed order, statement of undisputed material facts, and the Declaration of

Michael G. Seidel, was filed through the ECF system and will therefore be sent electronically to

Plaintiff's counsel identified on the Notice of Electric Filing (NEF).

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