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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN CIVIL LIBERTIES UNION and
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION,

Plaintiffs,

v.

NATIONAL SECURITY AGENCY,
CENTRAL INTELLIGENCE AGENCY,
DEPARTMENT OF DEFENSE,
DEPARTMENT OF JUSTICE, and
DEPARTMENT OF STATE,

Defendants.

No. 13 Civ. 9198 (KMW)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon (i) the accompanying memorandum of law, (ii) the accompanying declarations of Antoinette B. Shiner (of CIA); David M. Hardy (of FBI); David J. Sherman (of NSA); and Kevin Tiernan (of NSD), and an additional FBI declaration to be filed on or before July 7, 2017, and (iii) all prior proceedings and submissions herein, defendants, by their attorney, Joon H. Kim, Acting United States Attorney for the Southern District of New York, hereby move this Court for partial summary judgment, pursuant to Federal Rule of Civil

Procedure 56.

PLEASE TAKE FURTHER NOTICE that pursuant to the Court's operative scheduling orders (Dkt. Nos. 96, 98), FBI is to file an additional declaration in support of this motion on or before July 7, 2017; plaintiffs' cross-motion and opposition to defendants' motion shall be filed no later than July 14, 2017; and defendants' reply and opposition to plaintiffs' cross-motion shall be filed no later than July 28, 2017.

Dated: New York, New York
June 14, 2017

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