

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BRENNAN CENTER FOR JUSTICE  
AT NEW YORK UNIVERSITY  
SCHOOL OF LAW,

Plaintiff,

-v.-

UNITED STATES DEPARTMENT OF  
STATE,

Defendant.

Case No. 17 Civ. 7520 (PGG)

**NOTICE OF PLAINTIFF'S CROSS-  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT**

PLEASE TAKE NOTICE that upon the Declaration of Ishita Kala and attached exhibits, Statement of Undisputed Material Facts pursuant to Local Rule 56.1, the accompanying memorandum of law, and all prior pleadings and proceedings herein, Plaintiff Brennan Center for Justice at New York University School of Law respectfully moves this Court, before the Honorable Paul G. Gardephe, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 705, New York, New York, as soon as counsel may be heard, for an order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting partial summary judgment in favor of Plaintiff and against Defendant United States Department of State and specifically (i) ordering Defendant to remedy its inadequate search, (ii) denying Defendant's Exemption 5 claims, (iii) ordering Defendant to supplement its declarations with respect to Exemptions 1 and 7(E), and (iv) ordering Defendant to release all reasonably segregable portions of the responsive records.

Dated: New York, New York  
July 9, 2018

Respectfully submitted,

s/ Neil K. Roman

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