

**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.*

**Oral Argument Requested**

No. 13-cv-09198 (AT)

ECF Case

**NOTICE OF PLAINTIFFS' CROSS-MOTION  
FOR PARTIAL SUMMARY JUDGMENT**

Please take notice that upon the Memorandum of Law in Support of Plaintiffs' Cross-Motion for Partial Summary Judgment and in Opposition to Defendants' Motion for Partial Summary Judgment, dated April 20, 2016; and the Declaration of Jonathan Manes, dated April 20, 2016, and accompanying exhibits, Plaintiffs will move this Court, before the Honorable Analisa Torres, at the United States Courthouse, 500 Pearl Street, New York, New York, for an Order granting Plaintiffs partial summary judgment and denying Defendants partial summary judgment in the above-captioned case, pursuant to Rule 56 of the Federal Rules of Civil Procedure, and for such other and further relief as the Court deems just and proper.

Dated: April 20, 2016  
New York, New York

Respectfully submitted,

/s/ Ashley Gorski

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