

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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AMERICAN IMMIGRATION COUNCIL  
and TAHIRIH JUSTICE CENTER,

Plaintiffs,

v.

U.S. CUSTOMS AND BORDER  
PROTECTION; U.S. CITIZENSHIP AND  
IMMIGRATION SERVICES; and U.S.  
DEPARTMENT OF HOMELAND  
SECURITY,

Defendants.

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Civil Action No. 19-02965 (RC)

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Plaintiffs American Immigration Council and Tahirih Justice Center (“Plaintiffs”) brought suit against U.S. Department of Homeland Security, U.S. Citizenship and Immigration Services, and U.S. Customs and Border Protection (“Defendants”) under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, challenging Defendants’ responses to Plaintiffs’ FOIA request.

Defendants have satisfied all its obligations with respect to Plaintiffs’ request. Plaintiffs conducted an adequate search for the responsive records and lawfully withheld records under FOIA Exemptions 5, 6, 7(C), and 7(E), 5 U.S.C. § 552(b)(5), (b)(6), and (b)(7)(C), (E). As there are no material facts in dispute, Defendants respectfully move this Court pursuant to Rule 56 of the Federal Rules of Civil Procedure 56 for summary judgment as to all claims asserted.

The memorandum of points and authorities, statement of material facts not in genuine dispute supporting declaration, the exhibit thereto, establish that Defendants are entitled to the relief it seeks.

Dated: May 19, 2021

Respectfully Submitted,

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BRIAN P. HUDAK  
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/s/ Joseph F. Carilli, Jr.  
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