

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

_____)	
THE NATIONAL SECURITY ARCHIVE,)	
)	
Plaintiff,)	
)	
v.)	No. 06-CV-1080 (GK)
)	
CENTRAL INTELLIGENCE AGENCY,)	
<i>et al.</i> ,)	
)	
Defendants.)	
)	
_____)	

PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT

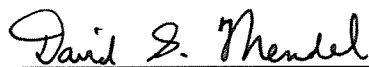
Plaintiff National Security Archive (“Archive”) hereby moves for summary judgment pursuant to Rule 56(a) of the Federal Rules of Civil Procedure. Pursuant to Local Civil Rule 7(f), the Archive requests an oral hearing on this motion.

The grounds for the Archive’s motion are set forth in the accompanying Memorandum of Points and Authorities in Support of Plaintiff’s Motion for Summary Judgment, the supporting Declaration and Exhibits, and the Archive’s Statement of Materials Facts as to Which Plaintiff Contends There is No Genuine Issue.

There is no genuine issue as to any material fact in this case. For the reasons appearing in the accompanying submissions, the Archive is entitled to judgment as a matter of law on all counts in its Complaint and respectfully requests that this Court grant its motion for summary judgment.

The Archive’s requested relief is set forth in the accompanying proposed order.

Respectfully submitted,



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DATE: September 8, 2006

CERTIFICATE OF SERVICE

I, David S. Mendel, hereby certify that on September 8, 2006 a copy of the foregoing Plaintiff's Motion for Summary Judgment, Statement of Material Facts, Memorandum of Points and Authorities in Support of Its Motion for Summary Judgment, and Proposed Order were served via electronic filing upon counsel for Defendants, identified below:

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Counsel for Defendants Central Intelligence Agency, General Michael V. Hayden, in his official capacity as Director of the Central Intelligence Agency, and Scott A. Koch, in his official capacity as Information and Privacy Coordinator of the Central Intelligence Agency

s/David S. Mendel
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