

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

[REDACTED]
AMERICAN CIVIL LIBERTIES UNION;
and AMERICAN CIVIL LIBERTIES
UNION FOUNDATION,

Plaintiffs,

v.

JOHN ASHCROFT, in his official capacity as
Attorney General of the United States;
ROBERT MUELLER, in his official
capacity as Director of the Federal Bureau of
Investigation; and MARION E. BOWMAN,
in his official capacity as Senior Counsel to
the Federal Bureau of Investigation,

Defendants.

04 Civ. 2614 (VM)

SEALED

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, plaintiffs [REDACTED]
[REDACTED] American Civil Liberties Union, and American Civil Liberties
Union Foundation respectfully move the Court to enter summary judgment on plaintiffs'
claims in this case. There are no genuine issues of material fact in dispute. Thus, for the
reasons stated in the enclosed Memorandum in Support of Plaintiffs' Motion for
Summary Judgment, and supported by the enclosed Statement of Undisputed Facts in
Support of Plaintiffs' Motion for Summary Judgment, and Declarations and Exhibits in
Support of Plaintiffs' Motion for Summary Judgment, plaintiffs are entitled to judgment
as a matter of law. Because this case involves important and complex issues of

constitutional law, plaintiffs respectfully request that the Court schedule oral argument on plaintiffs' motion.

Respectfully submitted,



JAMEEL JAFFER (JJ-4653)

ANN BEESON (AB-2082)

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