

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

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NATIONAL DAY LABORER ORGANIZING
NETWORK, CENTER FOR CONSTITUTIONAL
RIGHTS, and IMMIGRATION JUSTICE
CLINIC OF THE BENJAMIN N. CARDOZO
SCHOOL OF LAW,

ECF CASE

10 CV 3488 (SAS)(KNF)

[Rel. 10 CV 2705]

Plaintiffs,

v.

UNITED STATES IMMIGRATION
AND CUSTOMS ENFORCEMENT AGENCY,
UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,
FEDERAL BUREAU OF INVESTIGATION,
and OFFICE OF LEGAL COUNSEL

Defendants.

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

PLEASE TAKE NOTICE that upon the annexed: (1) Declaration of James Horton, dated February 11, 2011, together with the exhibits annexed thereto and (2) accompanying Memorandum of Law, Plaintiffs National Day Laborer Organizing Network, Center for Constitutional Rights, and the Kathryn O. Greenberg Immigration Justice Clinic of the Benjamin N. Cardozo School of Law, by and through their respective counsel, will move this Court pursuant to Rule 56 of the Federal Rules of Civil Procedure at the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, NY 10007-1312, on such date and at such time as the Court may direct, for an order granting Plaintiffs' instant Cross-Motion for

Partial Summary Judgment with respect to exemptions for Plaintiffs' Freedom of Information Act request, and for such other and further relief as this Court may deem just and proper.

Dated: February 11, 2011
New York, New York

Respectfully submitted,

/s/

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