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

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

Plaintiffs,

- against -

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

Defendants.

No. 10 Civ. 3488 (SAS)  
ECF Case

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Declaration of Christopher Connolly dated September 2, 2011, and the exhibits attached thereto, defendant United States Immigration and Customs Enforcement (“ICE”), by its attorney, Preet Bharara, United States Attorney for the Southern District of New York, hereby moves this Court

for an order granting ICE summary judgment on its withholdings pursuant to Freedom of Information Act (“FOIA”) exemption (b)(5) and the attorney-client privilege.

Dated: New York, New York  
September 2, 2011

Respectfully submitted,

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*Attorney for Defendants*

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