

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

CITIZENS FOR RESPONSIBILITY AND  
ETHICS IN WASHINGTON;  
AMERICAN HISTORICAL  
ASSOCIATION; and  
SOCIETY FOR HISTORIANS OF  
AMERICAN FOREIGN RELATIONS,

Plaintiffs,

v.

Civil Action No. 20-cv-739-APM

NATIONAL ARCHIVES AND RECORDS  
ADMINISTRATION;  
DAVID S. FERRIERO, in his official  
capacity as Archivist of the United States;  
U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT; and  
MATTHEW T. ALBENCE, in his official  
capacity as Acting Director of U.S.  
Immigration and Customs Enforcement,

Defendants.

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Plaintiffs move for summary judgment. In support of this motion, Plaintiffs submit the accompanying memorandum of points and authorities; declarations of James Grossman, Kristin L. Hoganson, Kristina Shull, Brianna Nofil, and Adam J. Rappaport; and proposed order.

Date: July 24, 2020

Respectfully Submitted,

/s/ Nikhel Sus

Nikhel S. Sus

(D.C. Bar No. 1017937)

Anne L. Weismann

(D.C. Bar. No. 298190)

CITIZENS FOR RESPONSIBILITY AND ETHICS  
IN WASHINGTON

1101 K St. NW, Suite 201

Washington, D.C. 20005  
Telephone: (202) 408-5565  
Fax: (202) 588-5020  
[nsus@citizensforethics.org](mailto:nsus@citizensforethics.org)  
[aweismann@citizensforethics.org](mailto:aweismann@citizensforethics.org)

*Counsel for Plaintiffs*