

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CARL L. STERN

Plaintiff

v.

ELLIOT L. RICHARDSON, Attorney
General of the United States

Defendant

CIVIL ACTION NO. 179-73

CROSS MOTION FOR SUMMARY JUDGMENT

Plaintiff, through his attorney, hereby moves this Honorable Court, pursuant to Rule 56 of the Federal Rules of Civil Procedure, to enter an order of summary judgment in the plaintiff's favor under his complaint as follows:

order that defendant's motion for summary judgment be denied;

order that plaintiff's cross motion for summary judgment be granted;

order that defendant produce any document which (i) authorized the establishment and maintenance of Counterintelligence Program New Left, (ii) terminated such program, and (iii) ordered or authorized any change in the purpose, scope and nature of such program.

This judgment is sought on the grounds that there is no genuine issue as to any material fact and that plaintiff is entitled to such judgment as a matter of law. This motion is based upon the complaint, defendant's statement of material facts as to which there is no genuine issue, plaintiff's statement of additional material facts as to which there is no genuine issue

and plaintiff's memorandum of points and authorities in opposition to defendant's motion to dismiss or in the alternative for summary judgment and in support of plaintiff's motion for in camera inspection and cross motion for summary judgment.

DATED: Washington, D.C.
June 26 1973

Respectfully submitted,

S/

Ronald L. Plesser
Attorney for Plaintiff

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