

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Harold Weisberg,  
Plaintiff,  
v.  
Department of Justice,  
Defendant.

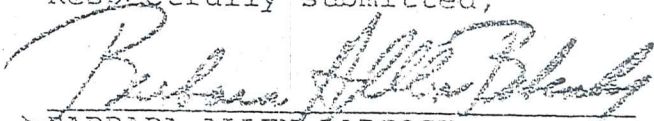
CA No. 75-1996

DEFENDANT'S MOTION FOR  
PARTIAL SUMMARY JUDGMENT

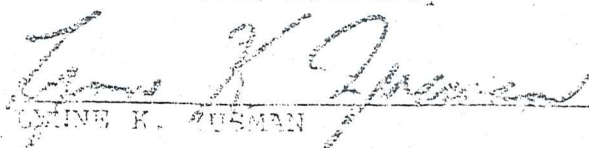
Defendant, by its undersigned attorneys, hereby moves the Court, pursuant to Rule 56 of the Federal Rules of Civil Procedure for summary judgment on the issue of the thoroughness and scope of defendant's search for records responsive to plaintiff's Freedom of Information Act request. The ground for this motion is that, there being no genuine issue of material fact, defendant is entitled to judgment as a matter of law.

In support of this motion the Court is respectfully referred to defendant's Memorandum of Points and Authorities, attached hereto, and to the affidavits of Federal Bureau of Investigation Special Agents Martin Wood, Clifford H. Anderson, Bennie F. Brewer, Kenneth A. Jacobsen, Herbert Northcutt, Jr., Burl F. Johnson, Edward A. Shea, Edwin A. Waite, and William L. Deaton, and to the affidavits of Douglas F. Mitchell and Quinlan J. Shea, Jr., of the Office of Privacy and Information Appeals, Department of Justice, attached hereto.

Respectfully submitted,

  
BARBARA ALLEN BABCOCK  
Assistant Attorney General  
Civil Division

EARL J. SILBERT  
United States Attorney

  
ELAINE K. GUSMAN

*Betsy Ginsberg*  
BETSY GINSBERG

Attorneys, Department of Justice  
10th & Pennsylvania Ave., N.W.  
Washington, D.C. 20530  
Tel: (202) 633-3770

Attorneys for Defendant