

**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,
EXECUTIVE OFFICE FOR IMMIGRATION
REVIEW, 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 Sunita Patel, dated March 26, 2012, 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

on Adequacy of Search for Defendants' Opt-Out and Rapid Production List productions, and for such other and further relief as this Court may deem just and proper.

Dated: March 26, 2012
New York, New York

Respectfully submitted,

/s/

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