## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JULIO SUAREZ,	) Case. No. 14-CV-00968-WWC
Plaintiff,	)
v.	)
ERIC H. HOLDER, JR., et al.,	)
Defendants.	) )

## MOTION FOR SUMMARY JUDGMENT

Now comes Plaintiff Julio Suarez, by and through undersigned counsel, and pursuant to Fed. R. Civ. P. 56, moves this Honorable Court for Summary Judgment. The motion is made upon the brief and exhibits filed in support thereof, the record in this case, and any argument the Court may hear.

Dated: November 13, 2014 Respectfully submitted,

By: /s/ Douglas Gould By: /s/Alan Gura

Douglas Gould (PA Bar No. 78357)

Law Offices of Douglas T. Gould, P.C.

925 Glenbrook Avenue

Alan Gura

Gura & Possessky, PLLC

105 Oronoco Street, Suite 305

Bryn Mawr, PA 19010 Alexandria, VA 22314

610.520.6181/Fax 610.520.6182 703.835.9085/Fax 703.997.7665

 $dgould@gouldlawpa.com \\ alan@gurapossessky.com$ 

Attorneys for Plaintiff

## CERTIFICATE OF SERVICE

I hereby certify that on this 13<sup>th</sup> day of November, 2014, I caused the foregoing to be served via electronic case filing, as follows:

DANIEL RIESS
Trial Attorney
U.S. Department of Justice
Civil Division, Rm. 6122
20 Massachusetts Avenue, NW
Washington, D.C. 20530
Telephone: (202) 353-3098

Fax: (202) 616-8460

Email: Daniel.Riess@usdoj.gov

/s/ Alan Gura Alan Gura