

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KNIGHT FIRST AMENDMENT INSTITUTE
AT COLUMBIA UNIVERSITY,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, U.S. CUSTOMS AND BORDER
PROTECTION, U.S. IMMIGRATION AND
CUSTOMS ENFORCEMENT, U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES, U.S. DEPARTMENT OF
JUSTICE, and U.S. DEPARTMENT OF
STATE,

Defendants.

No. 1:17-cv-07572-ALC

**NOTICE OF PLAINTIFF'S CROSS-MOTION FOR
PARTIAL SUMMARY JUDGMENT AND SUMMARY JUDGMENT**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law and the Declaration of Carrie DeCell and all exhibits thereto, Plaintiff the Knight First Amendment Institute at Columbia University (the "Knight Institute") hereby moves this Court for partial summary judgment against Defendants Immigration and Customs Enforcement ("ICE") and the Department of Justice Office of Legal Counsel ("OLC"), and for summary judgment against Defendant Department of State ("DOS"), pursuant to Rule 56 of the Federal Rules of Civil Procedure, and for such other relief as the Court deems just and proper.

Pursuant to the Court's Order of February 15, 2019, Defendants ICE, OLC, and DOS's opposition to the Knight Institute's cross-motion and reply in support of their own motion is due

by April 29, 2019, and the Knight Institute's reply in support of this motion is due on May 13, 2019.

Dated: March 28, 2019

Respectfully submitted,

/s/ Carrie DeCell

/s/ Megan Graham

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