

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DYLAN TOKAR,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
JUSTICE,

Defendant.

Civil Action No. 16-cv-2410 (RC)

PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56 and Local Rule 7, Plaintiff Dylan Tokar (“Plaintiff” or “Tokar”) respectfully moves the Court for summary judgment in his favor and against the Department of Justice (“DOJ” or “Defendant”) as to the DOJ’s improper withholding of records responsive to Plaintiff’s two requests under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

In support of this Motion for Summary Judgment (“Motion”) and in Opposition to Defendant’s Motion for Summary Judgment, Plaintiff submits the following: (1) Memorandum of Law; (2) Statement of Material Facts as to Which There Is No Genuine Issue and Response to Defendant’s Statement of Material Facts; and (3) Declaration of Dylan Tokar.

This Motion is based on the concurrently filed Memorandum of Law, all pleadings, records, and files in the above-captioned case, and on such argument as may be presented by counsel at any hearing on this Motion.

Plaintiff respectfully requests an oral hearing on his Motion pursuant to Local Rules 7(f)

and 78.1 at a date and time that is convenient for the Court.

Dated: August 23, 2017

Respectfully submitted,

/s/ Bruce D. Brown

Bruce D. Brown

DC Bar No. 457317

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