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Attorneys for Plaintiff Cecil D. Andrus

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

CECIL D. ANDRUS,)	
)	No. 1:15-cv-453-BLW
<i>Plaintiff,</i>)	
)	PLAINTIFF’S MOTION
vs.)	FOR SUMMARY JUDGMENT
)	
UNITED STATES)	
DEPARTMENT OF ENERGY)	
)	
<i>Defendant.</i>)	

Plaintiff Cecil D. Andrus respectfully move this Court, pursuant to Federal Rule of Civil Procedure 56, for entry of summary judgment in his favor on all or any of the claims for relief set forth in his Complaint in this matter. *See* First Amended Complaint (*Docket No. 3*).

This motion is supposed by the accompanying Plaintiff’s Combined Opening/Response Brief on Cross-Motions for Summary Judgment and Plaintiff’s Separate Statement of Undisputed Facts (and Attachments thereto), all pleadings and other matters in the record for this case, and by such other and further matters as may be presented to the Court prior to decision.

WHEREFORE, Plaintiff respectfully prays that the Court grant this motion for summary judgment and order Defendant to promptly produce all responsive documents without redactions under FOIA Exemption 5.

Dated this 4th day of April, 2016.

Respectfully submitted,

/s/ Laurence (“Laird”) J. Lucas
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CERTIFICATE OF SERVICE

I hereby certify that on this 4rd day of April, 2016, I caused the foregoing PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT, along with the accompanying PLAINTIFFS’ COMBINED OPENING/RESPONSE BRIEF ON CROSS-MOTIONS FOR SUMMARY JUDGMENT, PLAINTIFFS’ SEPARATE STATEMENT OF UNDISPUTED FACTS, and all ATTACHMENTS thereto to be electronically filed with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the counsel of record listed below:

Gary Feldon
U.S. Department of Justice
Washington, D.C.
gary.d.feldon@usdoj.gov

/s/ Laird J. Lucas
Laurence (“Laird”) J. Lucas