

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

GOVERNMENT ACCOUNTABILITY PROJECT)
1612 K Street, NW, Suite 1100)
Washington, DC 20006)
)
Plaintiff,)
)
v.)
)
U.S. FOOD AND DRUG ADMINISTRATION)
5600 Fishers Lane)
Rockville, MD 20857)
)
Defendant.)

Civ. No. 1:12-cv-01954 (KBJ)

PLAINTIFF’S CROSS-MOTION FOR SUMMARY JUDGMENT

Plaintiff Government Accountability Project respectfully moves for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure. As detailed in the accompanying Memorandum of Points and Authorities, supporting declarations and other documentary evidence, and statement of material facts, Defendant has failed to meet its burden with respect to demonstrating that the information requested by Plaintiff contained in the document identified by both parties as “Document 2” is exempt from disclosure. Thus, summary judgment should be awarded for Plaintiff.

Dated: August 2, 2013

Respectfully submitted,
/s/ Richard E. Condit

Richard E. Condit
Senior Counsel
DC Bar # 417786
1612 K Street, NW, Suite 1100
Washington, DC 20006
Tel. 202-457-0034 ext. 142
Fax. 202-457-0059
RichardC@whistleblower.org