

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

|                               |   |                             |
|-------------------------------|---|-----------------------------|
| MICHAEL DRIGGS, <i>et al.</i> | ) |                             |
|                               | ) |                             |
| Plaintiffs,                   | ) |                             |
|                               | ) |                             |
| v.                            | ) | Case No. 1:23-cv-1124 (DJN) |
|                               | ) |                             |
| CENTRAL INTELLIGENCE AGENCY   | ) |                             |
|                               | ) |                             |
| Defendant.                    | ) |                             |
| _____                         | ) |                             |

PLAINTIFFS' CROSS-MOTION FOR SUMMARY JUDGEMENT AND  
OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

COME NOW Plaintiffs the POW Investigative Project, Inc., Carol Hrdlicka, Megan Marx, Terri Mumley, Christianne O'Malley, Jana Orear, Michael Driggs, David Logan, Thomas Logan, Robert Moore, George Paterson, Mark Sauter and John Zimmerlee, pursuant to Rule 56 (c) of the Federal Rules of Civil Procedure, Local Civil Rule 56(B), and this Court's February 29, 2025 Order, and files this Motion for Summary Judgment.

In support of this relief, Plaintiffs respectfully submit the accompanying Memorandum of Points and Authorities, together with the affidavits of Senator Bob Smith, Norman D. Kass, and John H. Clarke.

DATE: May 21, 2025.

Respectfully submitted,

/ s/ John H Clarke  
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