

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' MOTION FOR *IN CAMERA* INSPECTION

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, and respectfully move this Court for *in camera* inspection of the redacted records at issue here.

In support of this relief, Plaintiffs refer the Court to Plaintiffs' *Memorandum in Support of their Motion for In Camera Inspection*, as well as their *Memorandum in Support of their Motion for Summary Judgment*, 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
John H. Clarke (VSB No. 023842)
1629 K Street, NW
Suite 300
Washington, DC 20006
(202) 344-0776
Fax (202) 332-3030
john@johnhclarkelaw.com
Counsel for Plaintiffs