

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

THE JAMES MADISON PROJECT

Plaintiff,

v.

CENTRAL INTELLIGENCE AGENCY

Defendant.

Civil Action No. 07-01154 (RMU)

\* \* \* \* \*

**RESPONSE TO DEFENDANT’S LOCAL RULE 7(h) STATEMENT OF  
MATERIAL FACTS AS TO WHICH THERE IS NO GENUINE ISSUE**

Pursuant to Local Rule 7.1 (h), the plaintiff respectfully responds to the defendant’s Statement of Material Facts as to Which There is No Genuine Issue.

1. Plaintiff does not dispute these statements.
2. Plaintiff does not dispute the factual contents of the Central Intelligence Agency’s letter dated July 26, 2002.
3. Plaintiff does not dispute this statement.
4. Plaintiff does not dispute these statements.
5. Plaintiff does not dispute this statement.
6. Plaintiff does not dispute the factual recitations of these statements in that the specific searches indicated were undertaken and that certain documents were retrieved, but does dispute any implied legal characterizations or conclusions that these searches were adequate or reasonable to locate all responsive records.
7. Plaintiff does not dispute the factual recitations of this statement in that certain responsive documents were released in part, but does dispute any legal characterizations

or conclusions regarding the applicability of FOIA exemptions or the segregability of information.

8. Plaintiff does not dispute the factual recitations of these statements in that certain records were withheld in full, but does dispute any legal characterizations or conclusions regarding the applicability of FOIA exemptions.

9. Plaintiff does not dispute these statements.

10. Plaintiff disputes this statement with respect to the applicability of the stated FOIA exemptions.

Date: July 1, 2008

Respectfully submitted,

/s/

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