

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

NATIONAL ASSOCIATION OF)	
CRIMINAL DEFENSE LAWYERS,)	
)	
)	
Plaintiff,)	
)	
v.)	
)	
EXECUTIVE OFFICE FOR UNITED)	
STATES ATTORNEYS and UNITED)	
STATES DEPARTMENT OF JUSTICE)	
)	
)	
Defendants.)	

Civil Action No. 14-cv-269 (CKK)

**DEFENDANTS’ OPPOSITION TO PLAINTIFF’S STATEMENT OF MATERIAL
FACTS AS TO WHICH THERE IS NO GENUINE DISPUTE**

Defendants hereby oppose Plaintiff’s Statement of Material Facts As to Which There Is Not Genuine Dispute (“Plaintiff’s Statement of Facts”) (ECF No. 15-2), filed by Plaintiff in Support of its Opposition to Defendants’ Motion for Summary Judgment and Cross-Motion for Summary Judgment. In support of this Opposition, Defendants state as follows:

Paragraphs 1-11 of Plaintiff’s Statement of Facts consist of Plaintiff’s responses to Defendants’ Statement of Facts as to Which there is No Genuine Dispute (“Defendants’ Statement of Facts”) (ECF No. 13-4). Plaintiff does not dispute paragraphs 1, 2, 4, 7, 9, 10, and 11 of Defendants’ Statement of Facts, but disputes in part paragraphs 3, 5, 6, and 8. Defendants reaffirm that Paragraphs 3, 5, 6, and 8 of Defendants’ Statement of Facts contain material facts that are not subject to a genuine dispute.

Paragraphs 12-50 of Plaintiff’s Statement of Facts consist of additional facts that Plaintiff contends are “material” and are not in “genuine dispute.” Defendants respond as follows:

- Paragraphs 12-25, 29-31, and 33-50 consist of statements that are not material to resolving this case. These paragraphs contain quotations from publicly available documents or Plaintiff's interpretation of public documents. These documents speak for themselves and Defendants need not respond to these allegations.
- Paragraphs 26, 27, 28, and 32 are not disputed.

Dated: September 2, 2014

Respectfully submitted,

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/s/ Héctor G. Bladuell
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