

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ELECTRONIC PRIVACY INFORMATION CENTER,)	
)	
Plaintiff,)	Civil Action No. 1:15-cv-667 (CRC)
)	
v.)	
)	
UNITED STATES DRUG ENFORCEMENT ADMINISTRATION,)	
)	
Defendant.)	

**PLAINTIFF’S RESPONSE TO DEFENDANT’S STATEMENT MATERIAL FACTS
NOT IN DISPUTE**

Pursuant to Local Rule 7(h) of the Rules of the United States District Court for the District of Columbia, Plaintiff Electronic Privacy Information Center (“EPIC”) hereby submits the following response to Defendant’s statement of material facts.

1. EPIC submits that the statements in paragraphs 2 and 3 of the Defendant’s supplemental statement (ECF No. 21-2) are incorrect because paragraphs 7 through 10 of EPIC’s statement of material facts are relevant and material to this case. The relevant paragraphs in EPIC’s statement address the likelihood that OPCL and SCOP Officers would have information about the location of DEA PIAs.

2. EPIC agrees with paragraph 4 of Defendant’s supplemental statement to the extent that the Court can refer to the provisions of the E-Government Act and the OMB Guidance documents for their contents, but EPIC contends that these materials are relevant because establish the obligations of federal agencies to maintain PIAs.

3. EPIC does not dispute the factual contentions in paragraphs 5 through 8 of

Defendant's supplemental statement.

4. EPIC recognizes that the factual contentions addressed in paragraph 9 of Defendant's supplemental statement are in dispute, but EPIC nevertheless maintains that the factual contentions in paragraphs 20-22 of EPIC's Statement of Material Facts are material.

Dated: March 23, 2016

Respectfully Submitted,

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