

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

NATIONAL SECURITY COUNSELORS, *

*

Plaintiff, *

*

v. *

Civil Action No. 1:11-cv-00445 (BAH)

CENTRAL INTELLIGENCE AGENCY, *

*

et al.,

*

Defendants. *

*

* * * * *

**PLAINTIFF’S REPLY IN SUPPORT OF ITS MOTION FOR A STAY OF BRIEFING OF
PORTIONS OF DEFENDANTS’ PARTIAL MOTION TO DISMISS PLAINTIFF’S
FIRST AMENDED COMPLAINT**

Defendants correctly state that Plaintiff’s Motion for a Stay in this case incorporated all of the arguments from its Motion for a Stay in the related case *National Security Counselors v. CIA*, No. 11-444. However, the fact that the Court denied Plaintiff’s Motion in that case does not automatically mean that the instant Motion is without merit, as the Counts in question are separate and distinct. Plaintiff therefore maintains its request that it be relieved of the burden of having to argue against the legitimacy of the still-amorphous patterns or practices alleged in Counts Four, Eleven, and Fourteen before Defendants file their Motion for Summary Judgment (with supporting declarations) regarding Counts 1-3, 7, and 12-13.

Date: July 5, 2011

Respectfully submitted,

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