

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GRANT F. SMITH

Plaintiff,

v.

Civil No. 1:15-cv-01431 (TSC)

CENTRAL INTELLIGENCE AGENCY

Defendant.

PLAINTIFF'S RESPONSE TO DEFENDANT'S STATUS REPORT

Plaintiff Grant F. Smith respectfully submits the following information pertaining to the Defendant's Status Report.

The Plaintiff is engaged in a number of related research projects about the legality of U.S. foreign aid to Israel that are culminating as the Congress and President prepare to pass what may be the largest package ever even as other US State Department budgets are cut. It is for this reason the Plaintiff has sought to accelerate the schedule of this piece of the larger puzzle.

The Plaintiff would find it manifestly unfair, if on the sole basis of Defendant's sudden motion of reconsideration, that summary judgement were to be granted in Defendant's favor without any chance for rebuttal.

Plaintiff respectfully asks that if the court finds that motion for reconsideration and affidavit to be compelling—which it should not—he be allowed an opportunity to file information currently at hand that he believes would satisfy this court that the affidavit, and particularly assertions of grave harms due to exposure of HUMINT, are entirely unfounded. This rebuttal could be filed with the court no later than May 15, 2017.

Dated April 24, 2017

Respectfully submitted,

Grant F. Smith, Pro Se
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