

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

CITIZENS FOR RESPONSIBILITY AND)
ETHICS IN WASHINGTON,)
)
Plaintiff,)

v.)

Civil No. 07-01707 (HHK/JMF)

EXECUTIVE OFFICE OF THE)
PRESIDENT, et al.,)
)
Defendants.)

NATIONAL SECURITY ARCHIVE,)
)
Plaintiff,)

v.)

Civil No. 07-01577 (HHK)

EXECUTIVE OFFICE OF THE)
PRESIDENT, et al.,)
)
Defendants.)

**PLAINTIFF CREW’S MOTION TO SHOW CAUSE WHY DEFENDANTS
SHOULD NOT BE HELD IN CONTEMPT AND FOR SANCTIONS**

Plaintiff Citizens for Responsibility and Ethics in Washington (“CREW”) hereby moves this Court to order defendants to show cause why they should not be held in contempt for violating the Court’s Memorandum Order of January 8, 2008 (Document 46) and for sanctions. The grounds for this motion are set forth in the accompanying memorandum of points and authorities filed in support of CREW’s motion.

Pursuant to LCvR 7(m), the undersigned counsel conferred with defendants’ counsel by telephone on March 6, 2008, in an effort to resolve this matter short of filing this motion, including defendants’ voluntary withdrawal of the Declaration of Theresa Payton. Plaintiff was

unable to resolve or narrow the issues and defendants' counsel has authorized plaintiff to represent that defendants oppose this motion.

Respectfully submitted,

/s/

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Dated: March 6, 2008