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**THOMAS G BRUTON
CLERK, U.S DISTRICT COURT**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

JACQUELINE STEVENS, PRO SE,)	
)	
Plaintiff)	
)	
v)	No. 17 C 2494
)	
UNITED STATES DEPARTMENT OF)	Judge Lee
STATE,)	
)	
Defendant)	

PLAINTIFF'S RESPONSE TO DEFENDANT UNITED STATES DEPARTMENT OF STATE
STATEMENT OF MATERIAL FACTS NOT IN DISPUTE AND STATEMENT OF FACTS THAT
ARE IN DISPUTE

Pursuant to Federal Rule of Civil Procedure 56, and Local Rule 56.1 Plaintiff submits this Response to Statement of Material Facts (SOMF) in opposition to Defendant's Motion for Summary Judgment.

18. Plaintiff denies statement that "parties agreed that the Department could reduce the number of documents that needed to be processed by using keywords to narrow the results of the searches."

Referencing Declaration by Eric Stein, Doc. 35, p. 19, ¶6.

82. Plaintiff denies this sentence: "In summary, the Department conducted a thorough search of all Department locations that were reasonably likely to contain records responsive to Plaintiff's FOIA Request."

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Respectfully submitted,



JACQUELINE STEVENS, Pro Se

11/6/2018

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