

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

JUDICIAL WATCH, INC.	)
501 School Street, S.W., Suite 500	)
Washington, DC 20024,	)
	)
Plaintiff,	)
	)
v.	)
	)
U.S. NATIONAL ARCHIVES AND	)
RECORDS ADMINISTRATION	)
8601 Adelphi Road	)
College Park, MD 20740-6001,	)
	)
Defendant.	)
_____	)

**PLAINTIFF’S REQUEST FOR HEARING; STATEMENT  
OF FACTS IN SUPPORT OF SAME**

Plaintiff Judicial Watch, Inc. (“Judicial Watch”), by counsel and pursuant to LCvR 65.1(d), respectfully requests that, within twenty (20) days, the Court hold a hearing on Judicial Watch’s application for an injunction in this Freedom of Information Act (“FOIA”) matter. In support of this request, Judicial Watch submits the following statement of facts.

1. Since April 5, 2006, Judicial Watch has been attempting to secure the release of certain records in the possession, custody, and control of the Clinton Presidential Library (“the Library”), which is operated and maintained by Defendant U.S. National Archives and Records Administration. *See* Verified Complaint for Declaratory and Injunctive Relief (“Verified Complaint”) at ¶¶ 5-9. The records at issue consist of largely the day planner, calendar, and daily schedule of Hillary Rodham Clinton when she was First Lady, among other, related documents. *Id.* at ¶ 5.

2. The Library acknowledged receipt of Judicial Watch's request and further acknowledged possessing a substantial volume of potentially records. *Id.* at ¶ 7. As of July 16, 2007, however, the Library has failed to produce any records responsive to the request or demonstrate that responsive records are exempt from production. *Id.* at ¶¶ 8-9. Nor has it indicated when any responsive records would be produced. *Id.* at ¶ 9.

3. Given Mrs. Clinton's current status as a presidential candidate, if not the front-runner for the Democratic Party's nomination, the public interest in her tenure as First Lady is undeniable.

4. Because Judicial Watch has a statutory right to the records at issue under FOIA and the Library has offered no legal justification or excuse for its failure to make the records publicly available, Judicial Watch's application for an injunction should be heard at the earliest practicable date.

Dated: July 16, 2007

Respectfully submitted,

JUDICIAL WATCH, INC.



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