

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

_____	)	
MARK MEADOWS,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Case No. 1:21CV3217 (CJN)
	)	
NANCY PELOSI, et al.,	)	
	)	
<i>Defendants.</i>	)	
_____	)	

**PLAINTIFF’S MOTION FOR JUDGMENT ON THE  
PLEADINGS, OR IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT,  
& IN OPPOSITION TO DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT**

Plaintiff Mark Meadows, by and through his undersigned counsel, in accordance with the Court’s Oral Order of May 4, 2022, hereby:

- a) moves pursuant to Fed. R. Civ. P. 12(c) for judgment on the pleadings;
- b) or, in the alternative, moves pursuant to Fed. R. Civ. P. 56(a) for summary judgment; and
- c) opposes Defendants’ Motion for Summary Judgment (ECF No. 15).

Plaintiff seeks the entry of judgment in his favor on all the claims in his amended complaint (ECF No. 13). Specifically, Plaintiff seeks judgment on the pleadings pursuant to Fed. R. Civ. P. 12(c) because no material fact is in dispute and Plaintiff is entitled to judgment as a matter of law without resort to extrinsic evidence. In the alternative, Plaintiff seeks summary judgment pursuant to Fed. R. Civ. P. 56(a) because there is no genuine dispute as to any material fact based on the evidence presented in support of Plaintiff’s motion and Plaintiff is entitled to judgment as a matter of law.

Inasmuch as the issues and relevant points and authorities are joined as to these Motions and Defendants' pending Motion for Summary Judgment, Plaintiff is filing a combined Memorandum of Points and Authorities in support of both his Motions and in opposition to Defendants' Motion. Attached to that Memorandum are Plaintiff's Statement of Undisputed Material Facts and his Response to Defendants' Statement of Undisputed Material Facts (ECF No. 15-28).

Wherefore, for the reasons stated in the above-referenced filings, Plaintiff asks the Court to: (i) enter judgment as a matter of law in favor of Plaintiff and against Defendants on all claims in Plaintiff's amended complaint; and (ii) deny Defendants' Motion for Summary Judgment, or in the alternative, grant Plaintiff's unopposed Motion filed pursuant to Fed. R. Civ. P. 56(d) (ECF No. 20), which the Court is holding in abeyance.

Dated: May 20, 2022

Respectfully submitted,  
MARK R. MEADOWS  
*By Counsel*

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**CERTIFICATE OF SERVICE**

I certify that, on May 20, 2022, a copy of the foregoing was filed on the Court's CM/ECF system, which will send notification to all counsel of record.

/s/ George J. Terwilliger III