

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

<hr/>)	
SOUTHERN ALLIANCE FOR CLEAN)	
ENERGY,)	
)	
Plaintiff,)	
)	Civil Action No. 10-1335 (RCL)
v.)	
)	
UNITED STATES DEPARTMENT OF ENERGY)	
)	
Defendant.)	
<hr/>)	

PLAINTIFF’S CROSS-MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff hereby moves for summary judgment on all claims of Plaintiff’s First Amended Complaint. For the reasons set forth in the accompanying memorandum, there are no genuine issues of material fact in dispute and Plaintiff is entitled to judgment as a matter of law. In support of this motion, Plaintiff submits a statement of material facts as to which there is no genuine issue, memorandum of law with Exhibits A through E, and a proposed order.

Dated: January 27, 2012

Respectfully submitted,

/s/ James B. Dougherty
James B. Dougherty
709 3rd Street SW
Washington, DC 20024
(202) 488-1140
DC Bar No. 939538

/s/ Mindy Goldstein
Mindy Goldstein
Turner Environmental Law Clinic
1301 Clifton Road
Atlanta, GA 30322
(404) 727-3432
GA Bar No. 727476
Pro hac vice

Counsel for Southern Alliance for Clean Energy