SUPERIOR COURT OF THE DISTRICT OF COLUMBIA CIVIL DIVISION

)
MICHAEL E. MANN, PH.D.,)
Plaintiff,) Case No 2012 CA 008263 B) Calendar No.: 3) Judge: Irving
v. NATIONAL REVIEW, INC., et al.,)) Oral Hearing Requested)
Defendants.)))

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT AGAINST NATIONAL REVIEW AND MARK STEYN ON THE ISSUE OF FALSITY, AND MOTION TO STRIKE THEIR AFFIRMATVE DEFENSES OF TRUTH AND SUBSTANTIAL TRUTH

Pursuant to D.C. Superior Court Rules of Civil Procedure 56 and 12-I(a), Plaintiff
Michael E. Mann, Ph.D. respectfully moves for partial summary judgment on the grounds that no
genuine issue of material fact exists as to the falsity element of his defamation claim, and that
plaintiff is entitled to judgment as a matter of law. Plaintiff also moves to strike defendants
National Review's and Mark Steyn's affirmative defenses of truth and substantial truth. In
support of this motion, Plaintiff submits a Memorandum of Points and Authorities, a Statement
of Undisputed Material Facts, a Declaration with exhibits attached thereto; and a Proposed
Order.

WHEREFORE, Plaintiff respectfully requests that the Court grant Plaintiff's motion for partial summary judgment as to falsity and to strike the affirmative defenses of truth and substantial truth.

Rule 12-I(a) Certification

The undersigned counsel certifies that he conferred with defense counsel and was unable to reach an agreement on this motion.

Dated: January 22, 2021 /s/ John B. Williams

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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2021, a copy of the foregoing Plaintiff's motion for partial summary judgment and to strike the affirmative defenses of truth and substantial truth was served via electronic filing or first-class mail on the following:

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