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 9 **UNITED STATES DISTRICT COURT**  
 10 **EASTERN DISTRICT OF WASHINGTON**  
 11 **AT YAKIMA**

12 STATE OF WASHINGTON, STATE OF  
 13 COLORADO, STATE OF CONNECTICUT,  
 STATE OF ILLINOIS, STATE OF  
 14 MARYLAND, STATE OF MICHIGAN,  
 15 STATE OF MINNESOTA, STATE OF  
 16 NEVADA, STATE OF NEW MEXICO,  
 STATE OF OREGON, STATE OF RHODE  
 17 ISLAND, STATE OF VERMONT,  
 18 COMMONWEALTH OF VIRGINIA, and  
 STATE OF WISCONSIN,

19 Plaintiffs,

20 v.

21  
 22 DONALD J. TRUMP, in his official capacity  
 as President of the United States of America;  
 23 UNITED STATES OF AMERICA; LOUIS  
 24 DEJOY, in his official capacity as Postmaster  
 General; UNITED STATES POSTAL  
 25 SERVICE,

26 Defendants.  
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NO. 1:20-cv-03127-SAB

DEFENDANTS' NOTICE OF DATA  
 IN RESPONSE TO THE COURT'S  
 OCTOBER 30, 2020 ORDER

**NOTICE OF DATA**

1  
2 Pursuant to the Court’s October 30, 2020 order (ECF No. 103), Defendants  
3 hereby respectfully submit data reports reflecting the current daily “all clear” status  
4 for each United States Postal Service facility in the Detroit and Lakeland  
5 geographical areas. USPS maintains plant-related data in such a way that there is no  
6 straightforward way to disaggregate data related to Detroit and Lakeland only. Thus,  
7 the attached report for all plants is over-inclusive, *i.e.*, the report includes data  
8 concerning the Detroit and Lakeland geographic areas, but also include plants  
9 outside of those areas. In other words, for database purposes, data concerning  
10 Detroit and Lakeland plants are included in data extracted for the Westshore and  
11 Lakeshores Districts.

12 Defendants also hereby provide the Court with explanations for three United  
13 States Postal Service facilities in the Detroit area that reported non-compliance with  
14 respect to daily “all clears.” The explanations are provided in the attached responses  
15 to USPS’s daily compliance survey of Plants and Delivery/Retail Units regarding  
16 Political Mail and Election Mail “all clear” procedures.

1 Dated: November 5, 2020

Respectfully submitted,

2 JEFFREY BOSSERT CLARK  
3 Acting Assistant Attorney General

4 ERIC R. WOMACK  
Assistant Director, Federal Programs Branch

5 */s/ Joseph E. Borson*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of November, I electronically filed the foregoing Notice of Data in Response to the Court’s October 30, 2020 Order with the Clerk by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: November 5, 2020

By: /s/Alexis J. Echols  
ALEXIS J. ECHOLS  
Counsel for Defendants