

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**Commonwealth of Pennsylvania, State of California, State of Delaware, District of Columbia, State of Maine, Commonwealth of Massachusetts, and State of North Carolina,**

Plaintiffs,

v.

Case No. 20-cv-4096

**Louis DeJoy, in his official capacity as United States Postmaster General, Robert M. Duncan, in his official capacity as Chairman of the Postal Service Board of Governors, and the United States Postal Service,**

Defendants.

**DEFENDANTS' SUPPLEMENTAL SUBMISSION**

1. During the September 15, 2020 hearing concerning Plaintiffs' motion to compel a 30(b)(6) deposition, the Court requested additional information concerning a July 10, 2020 Stand-Up Talk memorandum titled "Mandatory Stand-Up Talk: All Employees."
2. Attached as Exhibit A is a declaration by Robert Cintron that Defendants filed in a related matter before the U.S. District Court for the Southern District of New York ("Jones")<sup>1</sup> providing additional information concerning the source and effect of the July 10, 2020 memorandum referenced in paragraph 1 above.<sup>2</sup>
3. Attached as Exhibit B is a declaration by Angela Curtis that Defendants filed in *Jones* concerning the source and effect of the July 10, 2020 memorandum referenced in paragraph 1 above.<sup>3</sup>
4. Defendants will provide further information should the Court find it necessary.

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<sup>1</sup> *Jones v. USPS*, 20-cv-6516 (S.D.N.Y.).

<sup>2</sup> The declaration attached as Exhibit A refers to a prior declaration submitted by Robert Cintron, which previously was submitted to the Court as ECF No. 37-1.

<sup>3</sup> The declaration attached as Exhibit B refers to a prior declaration submitted by Angela Curtis, which was submitted to the Court as ECF No. 37-1.

Dated: September 15, 2020

Respectfully submitted,

JEFFREY BOSSERT CLARK  
Acting Assistant Attorney General

ERIC WOMACK  
Assistant Branch Director, Federal Programs Branch

/s/ Kuntal Cholera  
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**CERTIFICATE OF SERVICE**

I hereby certify that on September 15, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all users receiving ECF notices for this case.

/s/ Kuntal Cholera

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