

**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.

**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.

Case No. 20-cv-4096

NOTICE OF REPORTS

Pursuant to paragraphs 2 and 5 of the Court's preliminary injunction, *see* ECF No. 63, Defendants provide the Court with reports requested by both this Court and the U.S. District Court for the Southern District of New York in the matter of *Jones v. United States Postal Service*, No. 20 Civ. 6516 (S.D.N.Y. Sept. 25, 2020) (Marrero, J.). Exhibit A contains certain reasonably available overtime data collected in response to the request for "[t]he rate that the Postal Service incurred overtime, starting October 2, 2020, as a percentage of total work hours nationwide and as a percentage of total work hours within the two regional processing operations areas and four retail and delivery operations areas." ECF No. 63 ¶ 5(a). This data is subject to the limitations identified in the initial notice filed by the Postal Service. *See* ECF No. 71, at 1-3. Exhibit B contains reasonably available data collected in response to the Court's request for "[t]he number of late and

extra trips taken by Network & Local PVS & HCR, starting October 2, 2020.”¹ ECF No. 63 ¶ 5(b). Finally, Exhibit C contains the data submissions made today by the Postal Service in the *Jones* matter before the Southern District of New York.

Dated: October 30, 2020

Respectfully submitted,

JEFFREY BOSSERT CLARK
Acting Assistant Attorney General

ERIC WOMACK
Assistant Branch Director, Federal Programs Branch

/s/ Kuntal Cholera
KUNTAL V. CHOLERA
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, D.C. 20005
kuntal.cholera@usdoj.gov

Attorneys for Defendants

¹ Consistent with the representations made in USPS’s October 9 filing concerning data limitations, *see* ECF No. 71, USPS notes that the data it submits is subject to change as it is finalized. Hence, for example, Exhibit B contains data on late and extra trips for the period of October 1, 2020 through October 22, 2020 that is slightly different from the relevant data for the same time period submitted to the Court last week, *see* ECF No. 82-2. For example, Exhibit B notes that there were 2459 late trips on October 22, 2020, whereas the data from last week’s filing indicated that there were 2178 late trips on October 22, 2020, *see* ECF No. 82-2.

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 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

Kuntal V. Cholera
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, D.C. 20005

Attorney for Defendants