



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street, 3rd Floor
New York, New York 10007

January 14, 2021

BY ECF

Hon. Victor Marrero, United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Jones et al. v. United States Postal Service et al.*, No. 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents the defendants in the above-referenced case. We write respectfully, after having conferred with counsel for Plaintiffs and obtained their consent to this application, to request that Defendants be relieved of the requirement under the Preliminary Injunction Order in this case (*see* ECF No. 57) to provide the Court and Plaintiffs with a weekly update including: (1) the weekly report that the United States Postal Service (“USPS”) had been providing to Congress with respect to USPS’s Market-Dominant Products; (2) certain First-Class Mail service and variance reports; and (3) a summary of data and information collected by USPS Headquarters pertaining to various aspects of Election Mail, as detailed more fully in the Order. *Id.* ¶ 6. In Defendants’ view, the weekly reporting requirement is likely of minimal continuing value given that the 2020 election season has now drawn to a close and USPS does not expect to handle Election Mail to any significant degree in the coming months.

The parties continue to discuss next steps in this matter, and will update the Court as appropriate. We thank the Court for its consideration of these issues.

Respectfully,

AUDREY STRAUSS
Acting United States Attorney for the
Southern District of New York
Attorney for Defendants

By: /s/ Rebecca S. Tinio
REBECCA S. TINIO
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, New York 10007
Tel.: (212) 637-2774
E-mail: rebecca.tinio@usdoj.gov