## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

CENTER FOR BIOLOGICAL DIVERSITY,

Plaintiff,

v.

Case No. 1:25-cv-00612-RDM

U.S. DEPARTMENT OF INTERIOR, et al.,

Defendants.

## NOTICE OF FILING OF UNREDACTED ADMINISTRATIVE RECORDS AND WITHDRAWAL OF MOTION TO REDACT

Defendants in the above-captioned action respectfully file certain administrative records in unreduced form and withdraw their motion to reduce (ECF 25). By consent from Plaintiff, personally identifiable information (including social security names, dates of birth, and home addresses) remain reduced.

The Court ordered Defendants to reexamine whether redactions of names in the administrative record remain necessary and to file declarations supporting the need for continued redactions. *See* August 13 Min. Order. With the passage of time, Defendants have determined that the names subject to this administrative record (ECF 26) can now be disclosed without increased risk to those individuals' privacy or safety. Accordingly, Defendants withdraw their motion to redact and attach to this notice the applicable administrative records in unredacted form.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Because Defendants have filed the administrative record in unredacted form and withdrawn their motion to redact, Defendants understand the Court's August 13 Minute Order not to require the filing of declarations.

DATED: August 22, 2025 Respectfully submitted,

BRETT A. SHUMATE Assistant Attorney General Civil Division

ELIZABETH J. SHAPIRO Deputy Director Federal Programs Branch

/s/ Samuel S. Holt
SAMUEL S. HOLT
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, N.W.
Washington, D.C. 20005
Telephone: (202) 674-9761
Fax: (202) 616-8470
Samuel.Holt2@usdoj.gov

Counsel for Defendants

## **CERTIFICATE OF SERVICE**

I certify that on August 22, 2025, I electronically filed the foregoing and attachments and thereby caused a copy to be served on counsel of record.

/s/ Samuel S. Holt SAMUEL S. HOLT