

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

STATE OF CALIFORNIA, *et al.*,

*Plaintiffs,*

v.

No. 1:25-cv-13829

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, *et al.*,

*Defendants.*

**NOTICE OF COMPLIANCE**

Defendants, through their undersigned counsel, hereby file the certified administrative records for the alleged agency actions Plaintiffs challenged in the above-captioned case, in compliance with the parties' Joint Scheduling Motion of January 23, 2026. Defendants' production does not constitute a waiver of any of Defendants' arguments including that there is no final agency action in this case nor that an administrative record is not required to decide the issues presented. Defendants note that these are the same certified administrative records that were produced in *Chamber of Commerce of the United States & Association of American Universities v. U.S. Dep't of Homeland Security, et al.*, No. 1:25-cv-3675 (D.D.C.).

Respectfully Submitted,

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*/s/ Jeffrey Alderette*

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Dated: January 23, 2026