UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STATE OF NEW YORK, et al

Plaintiffs,

v.

18-CV-2921 (JMF)

UNITED STATES DEPARTMENT OF COMMERCE, et al.,

Defendants.

SECOND JOINT STIPULATION REGARDING SCOPE OF ADMINISTRATIVE RECORD

The parties hereby stipulate to the addition of the following materials to the Administrative Record in this case:

64. In addition to the documents already designated, the Administrative Record includes the native Excel files contained at PX-16 (corresponding to the slipsheets at PX-4, AR 12128-12129, AR 12134-12138; and PX-13, AR 12869, AR 12964-12966), with the exception of the file named < noisy_7.csv >.

Plaintiffs reserve the right to move that additional materials be considered part of the Administrative Record in this action.

Dated: November 12, 2018 Respectfully submitted,

BARBARA D. UNDERWOOD
Attorney General of the State of New York

By: /s/ Matthew Colangelo
Matthew Colangelo, Executive Deputy Attorney General
Elena Goldstein, Senior Trial Counsel
Office of the New York State Attorney General
28 Liberty Street
New York, NY 10005
Phone: (212) 416-6057
matthew.colangelo@ag.ny.gov

Attorneys for the State of New York Plaintiffs

AMERICAN CIVIL LIBERTIES UNION ARNOLD & PORTER KAYE SCHOLER LLP

By: /s/ John Freedman

Dale Ho

American Civil Liberties Union Foundation 125 Broad St. New York, NY 10004 (212) 549-2693 dho@aclu.org

Sarah Brannon* American Civil Liberties Union Foundation 915 15th Street, NW Washington, DC 20005-2313 202-675-2337

sbrannon@aclu.org
* Not admitted in the District of Columbia;
practice limited pursuant to D.C. App. R.
49(c)(3).

Perry M. Grossman New York Civil Liberties Union Foundation 125 Broad St. New York, NY 10004 (212) 607-3300 601 pgrossman@nyclu.org Andrew Bauer Arnold & Porter Kaye Scholer LLP 250 West 55th Street New York, NY 10019-9710 (212) 836-7669 Andrew.Bauer@arnoldporter.com

John A. Freedman Arnold & Porter Kaye Scholer LLP 601 Massachusetts Avenue, N.W. Washington, DC 20001-3743 (202) 942-5000 John.Freedman@arnoldporter.com

Attorneys for the NYIC Plaintiffs

Counsel for Defendants

JOSEPH H. HUNT Assistant Attorney General

BRETT A. SHUMATE
Deputy Assistant Attorney General

JOHN R. GRIFFITHS Director, Federal Programs Branch

CARLOTTA P. WELLS Assistant Branch Director

/s/ Carol Federighi

CAROL FEDERIGHI
KATE BAILEY
GARRETT COYLE
STEPHEN EHRLICH
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW, Washington, DC 20005
(202) 514-9239