

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CITIZENS FOR RESPONSIBILITY AND
ETHICS IN WASHINGTON,

Plaintiff,

v.

AMERICAN ACTION NETWORK,

Defendant.

Civil Action No. 18-cv-945 (CRC)

NOTICE OF JOINT STIPULATION OF FACTS

As noted in recent Court submissions, the parties have been pursuing substantial discovery through agreements and stipulations, including the Joint Stipulation Regarding Authenticity and Admissibility of Documents filed on March 24, 2021 (Dkt. No. 55). To that end, on July 1, 2021, the parties executed a detailed Joint Stipulation of Facts spanning various topics, which represents the culmination of this effort. At the request of American Action Network (“AAN”) (citing the sensitivity of this factual information), Citizens for Responsibility and Ethics in Washington (“CREW”) has agreed to wait until after this Court resolves AAN’s recent Motion for Reconsideration or, in the Alternative, for Certification and Stay (Dkt. No. 59) to file the Joint Stipulation of Facts (partially under seal) for Court review and approval.¹ All parties recognize that the close of fact discovery is July 9, 2021, and all parties agree further that the delayed *filing* of the Joint Stipulation of Facts until a later date conforms to the existing Court-ordered schedule because the actual fact discovery involved is already complete.

¹ To be sure, AAN and CREW differ on the merits and likely outcome of AAN’s motion for reconsideration, as detailed in their respective briefs, but all parties are amenable to this sequencing.

Should the Court have any questions, the parties are prepared to address this topic and any others.

Dated: July 8, 2021

Respectfully submitted,

/s/ Sathya Gosselin

Sathya S. Gosselin (No. 989710)

sgosselin@hausfeld.com

Seth R. Gassman (No. 1011077)

sgassman@hausfeld.com

Hilary K. Scherrer (No. 481465)

hscherrer@hausfeld.com

Claire A. Rosset (No. 1719756)

crosset@hausfeld.com

HAUSFELD LLP

888 16th Street, N.W., Suite 300

Washington, DC 20006

Telephone: (202) 540-7200

Facsimile: (202) 540-7201

Stuart C. McPhail (No. 1032529)

smcphail@citizensforethics.org

Adam J. Rappaport (No. 479866)

arappaport@citizensforethics.org

CITIZENS FOR RESPONSIBILITY

AND ETHICS IN WASHINGTON

1331 F Street, N.W., Suite 900

Washington, DC 20004

Telephone: (202) 408-5565

Fax: (202) 588-5020

Counsel for Plaintiff

/s/ Stephen Obermeier

Stephen Obermeier (No. 979667)

sobermeier@wileyrein.com

Caleb P. Burns (No. 474923)

cburns@wileyrein.com

Jeremy J. Broggi (No. 1191522)

jbroggi@wileyrein.com

WILEY REIN LLP

1776 K Street, NW

Washington, DC 20006

Telephone: (202) 719-7000

Fax: (202) 719-7049

Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned certifies that on July 8, 2021, a copy of the foregoing was filed with the Clerk of the Court using the CM/ECF electronic filing system, which automatically notifies counsel for all parties of the filing.

/s/ Sathya S. Gosselin