

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

WOONASQUATUCKET RIVER  
WATERSHED COUNCIL, *et al.*,

*Plaintiffs,*

v.

DEPARTMENT OF AGRICULTURE,  
*et al.*,

*Defendants.*

Case No. 1:25-cv-00097-MSM-PAS

**NOTICE OF FURTHER FACTUAL DEVELOPMENT**

Plaintiffs submit this notice to update the Court concerning the declarant whose IIJA funding from the Department of Energy (DOE) has been frozen for two months. *See* Ex. T, ECF No. 26-11; Ex. Y, ECF No. 32-3. Plaintiffs' reply brief noted that the declarant had heard from the state agency through which its grant money passes that DOE had resumed accepting claims for payment, but that the declarant had not yet received funds. Reply, ECF No. 32, at 3. On April 1, the day after Plaintiffs filed that reply brief, the declarant received a payment of funds via the state agency.

Dated: April 2, 2025

Respectfully submitted,

/s/ Miriam Weizenbaum

Miriam Weizenbaum (RI Bar No. 5182)  
DeLuca, Weizenbaum, Barry & Revens  
199 North Main Street  
Providence, RI 02903  
(401) 453-1500  
miriam@dwbrlaw.com

Kevin E. Friedl\* (Admitted only in New  
York; practice supervised by DC Bar  
members)  
Jessica Anne Morton\* (DC Bar No.  
1032316)  
Robin F. Thurston\* (DC Bar No. 1531399)  
Skye L. Perryman\* (DC Bar No. 984573)  
Democracy Forward Foundation  
P.O. Box 34553  
Washington, DC 20043  
(202) 448-9090  
kfriedl@democracyforward.org  
jmorton@democracyforward.org  
rthurston@democracyforward.org  
sperryman@democracyforward.org

\* admitted *pro hac vice*

**CERTIFICATE OF SERVICE**

On April 2, 2025, I caused the foregoing and accompanying materials to be served on all Defendants through the CM/ECF system.

/s/ Miriam Weizenbaum  
Miriam Weizenbaum