

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JERALD LENTINI, *et al.*,

Plaintiffs,

v.

Civil Action No. 1:25-cv-00166 (JMC)

DEPARTMENT OF GOVERNMENT
EFFICIENCY, *et al.*,

Defendants.

AMERICAN PUBLIC HEALTH
ASSOCIATION, *et al.*,

Plaintiffs,

v.

Civil Action No. 1:25-cv-00167 (JMC)

OFFICE OF MANAGEMENT AND
BUDGET, *et al.*,

Defendants.

* * * * *

NOTICE OF NEW EVIDENCE

In support of their Motion for Expedited Discovery, Dkt. #20, Plaintiffs Jerald Lentini, Joshua Erlich, and National Security Counselors, Inc. hereby submit new evidence which conclusively demonstrates that expedited discovery is urgently needed to ascertain the nature of the Department of Government Efficiency and its relationship to the United States DOGE Service, of which Amy Gleason is the Acting Administrator. At approximately 9:46 PM, President Trump stated the following in his Joint Address to Congress:

To further combat inflation, we will not only be reducing the cost of energy, but will be ending the flagrant waste of taxpayer dollars. And to that end, I have created

the brand new Department of Government Efficiency, DOGE. Perhaps you've heard of it. Perhaps. *Which is headed by Elon Musk*, who is in the gallery tonight.

Live: Donald Trump delivers speech to Congress, Assoc. Press (Mar. 4, 2025), at

<https://www.youtube.com/watch?v=LEygBVr1neI> (last accessed Mar. 4, 2025) (emphasis added).

Date: March 4, 2025

Respectfully submitted,

/s/ Kelly B. McClanahan

Kelly B. McClanahan, Esq.

D.C. Bar #984704

National Security Counselors

1451 Rockville Pike

Suite 250

Rockville, MD 20852

501-301-4672

240-681-2189 fax

Kel@NationalSecurityLaw.org

Counsel for Plaintiffs Lentini, Erlich, and NSC