

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA

AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES, AFL-CIO, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States of
America, *et al.*,

Defendants.

Case No. 1:25-cv-00264-JMC

STIPULATION OF VOLUNTARY DISMISSAL

The parties hereby stipulate and agree that the above-captioned action is voluntarily dismissed without prejudice pursuant to Fed. R. Civ. P. Rule 41(a)(1)(A)(ii). Each party will bear its own fees and costs.

Plaintiffs in the above-captioned action intend, by way of an amended complaint, to join the pending lawsuit in *Public Employees for Environmental Responsibility v. Trump*, No. 8:25-cv-260 (D. Md., Jan. 28, 2025) (“*PEER*”).¹ All parties agree that judicial efficiency and the resources of the parties will benefit from this consolidation of actions; Defendants therefore agree to consent to the amendment of the complaint in *PEER* to allow for the addition of Plaintiffs in this matter as plaintiffs in *PEER*. Defendants however reserve all rights and defenses in the *PEER* action. The parties further agree that, for purposes of Rule 41(d), dismissal of this matter followed by Plaintiffs joining *PEER* by amendment does not constitute filing “an action based on or including the same claim against the same defendant.”

¹ Plaintiffs’ counsel Mark B. Samburg and Elena Goldstein represent the plaintiff in *PEER*; that plaintiff has agreed to such an amendment.

Dated: November 24, 2025

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