

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

OPEN TECHNOLOGY FUND,

Plaintiff,

v.

KARI LAKE, in her official capacity, *et al.*,

Defendants.

No. 25-cv-00840-RCL

**DEFENDANTS' SUPPLEMENTAL NOTICE**

As discussed in open court this morning, earlier today Defendants sent Plaintiff the attached email further clarifying the March 26 letter rescinding the March 15 termination of Plaintiff's grants.

Dated: March 27, 2025

Respectfully submitted,

YAAKOV M. ROTH  
Acting Assistant Attorney General

ERIC J. HAMILTON  
Deputy Assistant Attorney General  
Civil Division, Federal Programs Branch

JOSEPH E. BORSON  
Assistant Branch Director  
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*/s/ Abigail Stout*

ABIGAIL STOUT  
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/s/ Julia A. Heiman

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*Attorneys for Defendants*

**F** [REDACTED]

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**From:** Roman Napoli <RNapoli@usagm.gov>  
**Sent:** Thursday, March 27, 2025 9:29 AM  
**To:** Laura Cunningham <laura@opentech.fund>  
**Cc:** Kari Lake <KLake@usagm.gov>; Royce Min <RMin@usagm.gov>; Amy Batchelor <ABatchelor@usagm.gov>  
**Subject:** Re: Letter from USAGM Senior Advisor Lake

Laura,

Per Senior Advisor Lake's letter of March 26 rescinding the March 15 letter, I can confirm that the March 26 letter also covers "any other grants" with USAGM, including the FY 2023 and FY 2024 grants. In addition, as the grants are "back in effect," the agency will today begin processing the funding request submitted by OTF to USAGM on February 26, 2025 for \$655,508.

Roman

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**From:** Royce Min  
**Sent:** Wednesday, March 26, 2025 9:32 PM  
**To:** Laura Cunningham <laura@opentech.fund>  
**Cc:** Kari Lake <KLake@usagm.gov>  
**Subject:** Letter from USAGM Senior Advisor Lake

Laura,

USAGM Senior Advisor Lake requested that I transmit the attached letter from her.

Royce Min  
USAGM/General Counsel