

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DC PRESERVATION LEAGUE, *et al.*,

Plaintiffs,

vs.

UNITED STATES DEPARTMENT OF
THE INTERIOR, *et al.*,

Defendants.

Case No. 1:26-cv-477

DECLARATION OF WILL BARDWELL

1. I am Will Bardwell, counsel for the Plaintiffs in the above-styled matter. I submit this Declaration in compliance with Local Rule 65.1(b).
2. At approximately 6 p.m. Eastern Time on Friday, October 9, 2026, I learned that Defendants had filed notice (at 4:55 p.m.) of their intent to begin a tree-clearing operation at East Potomac Golf Course the following day. By this time, regular business hours had concluded for the three-day holiday weekend.
3. Plaintiffs subsequently decided to prepare an emergency motion for a temporary restraining order. As explained in the motion and supporting memorandum, the exigent circumstances do not permit waiting until business hours resume on Tuesday to file this emergency motion, and

counsel was accordingly unable to provide notice of this motion to the clerk's office during business hours.

4. I declare under 28 U.S.C. § 1746 and under penalty of perjury that the foregoing is true and correct.

Executed on October 11, 2026, in Madison, Mississippi.

/s/ Will Bardwell
Will Bardwell
Democracy Forward Foundation
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