

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

AMERICAN FEDERATION OF
TEACHERS, et al.,

Plaintiffs,

v.

SCOTT BESSENT, et al.,

Defendants.

Case No. 8:25-cv-430-DLB

ERRATA

Defendants file this errata to address technical issues with certain pages administrative records for the U.S. Department of Education and the Office of Personnel Management filed on March 7, 2025. Attached as Exhibit 1 is a reproduction of the Department of Education administrative record, as filed on March 7, with Bates numbers and a readable version of pages ED-000013-16. Exhibit 2, also attached, includes a re-production of the redacted spreadsheet previously produced as OPM-000030-52 in a more easily readable format. Exhibit 2 also includes the redacted version of a second sheet contained in the “Account Creation Audit” file in OPM’s administrative record that was inadvertently not included in Defendants’ March 7 filing. Defendants provided the redacted, native version of the file to Plaintiffs’ counsel on March 8 at their request.

Dated: March 10, 2025

Respectfully submitted,

YAAKOV M. ROTH
Acting Assistant Attorney General
Civil Division, Federal Programs Branch

ELIZABETH J. SHAPIRO
Deputy Branch Director
Civil Division, Federal Programs Branch
United States Department of Justice
1100 L Street, N.W.
Washington, D.C. 20005
Tel: (202) 514-2705
Fax: (202) 616-8470
Elizabeth.Shapiro@usdoj.gov

EMILY HALL
Counsel to the Assistant Attorney General
Civil Division
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530
Tel: (202) 307-6482
Emily.Hall@usdoj.gov

/s/ Bradley P. Humphreys
BRADLEY P. HUMPHREYS
Senior Trial Counsel
Civil Division, Federal Programs Branch
United States Department of Justice
1100 L Street NW
Washington, DC 20005
Telephone: (202) 305-0878
Bradley.Humphreys@usdoj.gov

Kelly O. Hayes
Interim U.S. Attorney

ARIANA WRIGHT ARNOLD
USDC Md Bar No. 23000
Assistant United States Attorney
36 S. Charles St., 4th Floor
Baltimore, Maryland 21201
Tel: (410) 209-4813
Fax: (410) 962-2310
Ariana.Arnold@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that on March 10, 2025, I electronically filed the foregoing and the accompanying attachments, and thereby caused a copy to be served on counsel of record.

/s/ Bradley P. Humphreys
BRADLEY P. HUMPHREYS