

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

Vote Forward, et al.,

Plaintiffs,

v.

Louis DeJoy, et al.,

Defendants

Case No. 20-cv-2405

DEFENDANTS' SUMMARY OF INFORMATION LEARNED FROM PLANT MANAGERS

Pursuant to the Court's November 5, 2020, Order, Defendants provide below a summary of information learned from plant managers for the following USPS districts: Greensboro, Mid-Carolinas, Central Pennsylvania, Western Pennsylvania, and Philadelphia Metropolitan. Additionally, attached hereto as Exhibit 1 is a report showing the total number of ballots identified through daily sweeps of processing facilities in states with extended ballot receipt deadlines.

Plant	1st Sweep of Ballots	2nd Sweep of Ballots	Steps Taken to Deliver to Local BOE by 5:00 PM
Pittsburgh PDC	160	137	Customer Service picked up ballots from plant and hand delivered to BOE.
Erie PDC	0	0	No ballots found.
Johnstown PDC	17	6	Hand delivery to each respective BOE Post Office.
Altoona PDC	2	0	Dispatched to Delivery Unit who took to BOE.
Pennwood Place	0	0	No ballots found.
Pittsburgh NDC	0	0	No ballots found.
Raleigh P&DC	0	27	Customer Service picked up ballots from the Plant and delivered to the BOEs.
Rocky Mount P&DF	12	70	Customer Service picked up the ballots from the Plant and delivered to the BOEs.

Greensboro P&DC	48	29	Customer Service picked up the ballots from the Plant and delivered to the BOEs.
Philadelphia P&DC	914	162	Hand delivery to each respective BOE Post Office.
Harrisburg	17	18	Morning delivered from the plant via Express Mail run to Post Office who, in turn, hand delivered to BOE. Afternoon hand delivered District Employees.
Lehigh Valley	206	60	First sweep sent ballots from plant via Express Mail run, and all were delivered timely by respective Post Office. On the second sweep we delivered all ballots to the respective BOE Delivery Units via Postal Employees.
Scranton	0	4	Hand delivered to the BOE by each local Postmaster.
Fayetteville P&DC	1	37	Plant runners hand delivered ballots to the BOEs.
Fayetteville DRANX	0	4	Plant runners hand delivered ballots to the BOEs.
Mid C P&DC	0	1	Plant delivered to the hub and from there Customer Service hand delivered to the BOEs.
Charlotte P&DC	261	50	Plant delivered to the hub and from there Customer Service hand delivered to the BOEs.
Greenville P&DC	0	0	No ballots found.

Dated: November 6, 2020

Respectfully submitted,

JEFFREY BOSSERT CLARK
Acting Assistant Attorney General

ERIC WOMACK
Assistant Branch Director
Federal Programs Branch

/s/ John Robinson
JOSEPH BORSON
KUNTAL V. CHOLERA
ALEXIS ECHOLS
DENA ROTH
JOHN ROBINSON
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, D.C. 20005
Telephone: (202) 616-8489
E-mail: john.j.robinson@usdoj.gov

Attorneys for Defendants