

Attorneys General of Massachusetts, California, New York, Connecticut, Arizona, Colorado, Delaware, Hawaii, Illinois, Maine, Maryland, Michigan, Minnesota, New Jersey, New Mexico, North Carolina, Oregon, Rhode Island, Vermont, Washington, Wisconsin, and the District of Columbia, the Corporation Counsel of the City of Chicago, and the Corporation Counsel of the City of New York

Via Electronic Submission on Regulations.Gov

August 6, 2025

Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

Re: Request for Extension of Comment Period and Additional Public Hearings Regarding Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

EPA-HQ-OAR-2025-0194

Dear Administrator Zeldin:

The undersigned State Attorneys General and City Attorneys respectfully request an extension of the deadline for comments on EPA's proposed *Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards*, 90 Fed. Reg. 36,288 (Aug. 1, 2025) (Proposed Rule). The Proposed Rule would withdraw the 2009 endangerment finding (2009 Endangerment Finding) for vehicle greenhouse gas emissions and repeal the entire regulatory program for these emissions across all classes and all model years, thus proposing to reverse the results of nine prior rulemaking proceedings. It also offers multiple legal and factual bases for multiple proposed actions. The Proposed Rule thus comprises

many complex proposals in a single Federal Register notice. But the current comment deadline—September 15, 2025—is just 45 days after the proposal’s publication in the Federal Register. Given the breadth and complexity of this proposal, including its impact on the economy, human health, and the environment, a 45-day comment period is wholly inadequate. Indeed, the 45-day comment period is inconsistent with general Executive Branch practice and past EPA practice in the context of both greenhouse-gas endangerment findings and vehicle emission standard rulemakings. Forty-five days is also woefully insufficient given that EPA has yet to place in the rulemaking docket information critical to understanding the basis of the proposal, as required by the Clean Air Act, 42 U.S.C. § 7607(d), and the Administrative Procedure Act, 5 U.S.C. § 553. Accordingly, at minimum, the comment deadline should be extended to the later of 120 days after issuance of the proposed rule or 60 days following EPA’s docketing of factual material critical to understanding the basis of the proposal. At the very least, pursuant to Clean Air Act Section 307(d)(5)(iv), the agency must extend the public comment period until 30 days after the end of public hearings.

We also request additional public hearings beyond the two virtual public hearings announced for August 19 and 20, 2025, dates which are less than three weeks after publication of the Proposed Rule. We ask that EPA hold additional public hearings in states that would find themselves most impacted by the repeal of the 2009 Endangerment Finding and the vehicle greenhouse gas programs, including states likely to face the most dire consequences if the Proposed Rule is finalized.

Comment Period Extension Request

According to Executive Order 12866, which remains in effect as amended, “a meaningful opportunity to comment on any proposed regulation ... should include a comment period of not less than 60 days.” 58 Fed. Reg. 51,735, 51,740 (Oct. 4, 1993). Notice and sufficient time for public comment are critically important “(1) to ensure that agency regulations are tested via exposure to diverse public comment, (2) to ensure fairness to affected parties, and (3) to give affected parties an opportunity to develop evidence in the record to support their objections to the rule and thereby enhance the quality of judicial review.” *Prometheus Radio Project v. F.C.C.*, 652 F.3d 431, 449 (3d Cir. 2011) (citing *Int’l Union, United Mine Workers of Am. v. Mine Safety & Health Admin.*, 407 F.3d 1250, 1259 (D.C. Cir. 2005)). This same logic applies to repeals, as the notice and comment period for a repeal of a final rule “ensures that an agency will not undo all that it accomplished through its

rulemaking without giving all parties an opportunity to comment on the wisdom of repeal.” *California by & through Becerra v. U.S. Dep’t of the Interior*, 381 F. Supp. 3d 1153, 1172 (N.D. Cal. 2019) (citing *Consumer Energy Council of Am. v. Fed. Energy Regul. Comm’n*, 673 F.2d 425, 446 (D.C. Cir. 1982)). Here, the scope, complexity, and impact of the Proposed Rule, and EPA’s failure to provide necessary data and scientific support, assess economic impacts, or consider reliance interests, warrant an extension of the comment period to at least 120 days.

First, the scope, complexity, and impact of the Proposed Rule warrant an extension. “[C]ourts have considered the length of the comment period utilized in the prior rulemaking process as well as the number of comments received during that time-period” when evaluating the adequacy of repeal comment periods *California by & through Becerra*, 381 F. Supp. at 1177 (citing *N.C. Growers’ Ass’n, Inc. v. United Farm Workers*, 702 F.3d 755, 770 (4th Cir. 2012)). As a proposed repeal of the 2009 Endangerment Finding and entire light-, medium-, and heavy-duty vehicle GHG regulatory programs, the Proposed Rule is at least four different rules in one, each with numerous alternative proposed bases. *Each* of these four rules individually should require *at least* a 60-day comment period, yet EPA has only provided the public 45 days total to respond.

Moreover, each alternative in the Proposed Rule is complex and impactful and a subject of significant public interest. Section IV.B. of the Proposed Rule, for example, revisits scientific findings EPA made 16 years ago that concern what might be the most calamitous environmental challenge of our time: climate change. EPA itself has described the proposed action as “historic,”¹ and submitted it for review by the White House Office of Information and Regulatory Affairs as a “significant regulatory action.” Indeed, EPA specifically requests comment on 27 different topics, many of which are significant, novel, and complex. EPA’s characterizations of the Proposed Rule and its extensive list of topics for comment are consistent with the significant public interest in each of the actions EPA now proposes to rescind. EPA made “[p]ublic review and comment ... a major component” of the agency’s rulemaking process for the initial 2009 Endangerment Finding. *Endangerment and Cause or Contribute Findings for Greenhouse Gases*

¹ U.S. Env’t Prot. Agency, *EPA Launches Biggest Deregulatory Action in U.S. History* (Mar. 12, 2025), <https://perma.cc/ER5E-E8JQ>; see also U.S. Env’t Prot. Agency, *WHAT THEY ARE SAYING: Leaders Praise the EPA for Launching Largest Deregulatory Action in U.S. History with Proposal to Rescind Obama-Era Endangerment Finding* (Aug. 5, 2025), <https://perma.cc/S2JX-45QX>.

Under Section 202(a) of the Clean Air Act, 74 Fed. Reg. 66,496, 66,500 (Dec. 15, 2009). EPA provided the public two nonconsecutive periods—the first, 120 days; the second, 60 days—and two in-person public hearings to comment on that finding. *Id.* In the second of the public comment periods alone, EPA received a “very large number of comments”—over 380,000—showing the high level of public interest in these issues. Similarly, the original 2010 and 2011 greenhouse gas vehicle rules, for light-duty and medium- and heavy-duty vehicles, each of which had distinct comment periods longer than that provided here, received a large number of comments, over 129,000 and 41,000 comments respectively. *Light-Duty Vehicle GHG Emission Standards and Corporate Average Fuel Economy Standards*, 75 Fed. Reg. 25,324, 25,328 (May 7, 2010); *Greenhouse Gas Emissions Standards and Fuel Efficiency Standards for Medium- and Heavy-Duty Engines and Vehicles*, 76 Fed. Reg. 57,106, 57,362 (Sept. 15, 2011).

That high level of interest, and EPA’s provision of comment periods of at least 60 days, have been sustained for subsequent greenhouse-gas endangerment findings. *E.g.*, *Proposed Finding that Greenhouse Gas Emissions from Aircraft Cause or Contribute to Air Pollution That May Reasonably Be Anticipated to Endanger Public Health and Welfare and Advance Notice of Proposed Rulemaking*, 80 Fed. Reg. 37,758 (July 1, 2015). Indeed, in repealing the Clean Power Plan, EPA provided over 150 days for a comment period, extended from 120 days. *Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units*, 84 Fed. Reg. 32,520 (July 8, 2019). Against that backdrop, a 45-day comment period is plainly inadequate.

Second, a 45-day comment period is insufficient because EPA has failed its statutory duty to disclose factual material necessary to understand and meaningfully comment on the proposal. *See* 5 U.S.C. § 553(b); 42 U.S.C. 7607(d)(3). Most notably, EPA relies heavily on a previously undisclosed *draft* report prepared by the Department of Energy (DOE) to support EPA’s alternative proposal to rescind the 2009 Endangerment Finding based on the claim that scientific developments undermine the assumptions, methodologies, and conclusions of the 2009 Endangerment Finding. 90 Fed. Reg. at 36,308–10 (citing “2025 CWG Draft Report” in support of claims regarding, *inter alia*, the reliability of International Panel on Climate Change (IPCC) reports and climate modeling in the 2009 Endangerment Finding; the contribution of climate change to heat waves, extreme weather, and sea-level rise; the causal role of anthropogenic emissions in climate change; and the “benefits” of greenhouse gas emissions). DOE has now released “an

updated version” of the draft report and sought public comment on that report, “which includes additional information and typographical corrections.” *Id.* at 36,292 n.10, 36,308 n.97; see *DOE, Notice of Availability: A Critical Review of Impacts of Greenhouse Gas Emissions on the U.S. Climate*, 90 Fed. Reg. 36,150 (Aug. 1, 2025). While EPA claims it did not rely upon the additional information or corrections in the updated DOE report to formulate that proposal, EPA nonetheless has failed to disclose how or why the information in the report has already changed and failed to address whether EPA will rely on the final report, including any revisions DOE makes in response to public comment or otherwise. This deprives the public of a meaningful opportunity to understand and comment on the evidence EPA is considering here, especially given that the key report on which EPA relies is currently undergoing public review and comment (with an even *shorter* comment period than that afforded here). Notably, one of the draft report’s authors has revealed that “an internal review from eight scientists/administrators employed by the DOE” yielded “reviews [that] were quite interesting and varied,” but to which the authors have yet to “respond[] in detail.”² As a federal advisory committee, DOE’s “Climate Working Group” is subject to the extensive disclosure and public-participation requirements of 5 U.S.C. ch. 10. If EPA intends to rely on any form of this report or draft thereof, it must extend the public comment period to at least 60 days after the report is complete and all laws governing disclosure of Climate Working Group materials have been followed.

Third, additional time for public comment is also necessary to compile a complete technical record on EPA’s proposed findings. In contrast to the just two months EPA spent with the draft DOE report—its primary source for its alternative proposal—following *Massachusetts v. EPA*, 549 U.S. 497, 533 (2007), EPA spent *two years* reviewing the voluminous scientific and technical information concerning climate change and the contribution of greenhouse gases from motor vehicles to reach the determination reflected in the Endangerment Finding. EPA is now effectively requiring the public to compile and summarize that research—which has exponentially expanded in the intervening years—in 45 days. That is woefully inadequate, especially since, as noted above, the primary basis for EPA’s analysis is

² Judith Curry, *New Climate Assessment Report from US DOE*, Climate Etc. (July 29, 2025), <https://perma.cc/MXY7-B6AQ>.

an unstable draft report that has already changed and is likely to change more, now that it has been released for public comment.

Fourth, EPA has further impeded the ability of the public to understand and comment on the Proposed Rule by failing to provide fundamental information in the economic impact analysis required under Section 317. 42 U.S.C. § 7617 (a)(5),(d) (requiring an economic impact assessment for all § 202 vehicle rules that is “as extensive as practicable”). As described above, the Proposal seeks to repeal some of the most successful and beneficial rules promulgated by EPA under the Clean Air Act. Yet, neither the Proposed Rule nor the draft regulatory impact analysis seriously address the impact of these proposed repeals on the investments of the automobile industry and states and local governments in EV research, development, production, and infrastructure. Nor does EPA consider the potential health and environmental impacts of increased greenhouse gas emissions that will harm the public and certainly affect the economy. Given EPA’s failure, the public needs more time to attempt to compile and present this information themselves, thereby enabling EPA to give it the requisite consideration.

Fifth, a 45-day comment period is also not sufficient given the need to compile and present information on the widespread and significant reliance interests that will be injured by withdrawal of the Endangerment Finding and repeal of the vehicle greenhouse regulatory framework that has shaped multiple industries and employment sectors for the last 15 years. Although EPA explicitly seeks comment on regulated parties’ compliance investments and reliance on vehicle standards, 2009 Endangerment Finding. 90 Fed. Reg. at 36,297–98 nn.37–40, it excludes consideration of the very significant reliance interest that states, local governments, and the public as a whole have in maintaining the substantial greenhouse gas emission reductions afforded by the Endangerment Finding and vehicle emission standards to lessen the risk of serious climate change harms. Here, EPA’s failure to seriously address—or even acknowledge—the full range of reliance interests that will be harmed by the Proposed Rule means that, once again, commenters must be given sufficient time to evaluate and explain how they will be impacted, so that EPA may appropriately consider those reliance interests in any final rule.

Sixth, included with the Proposed Rule is a 323-page memorandum, heavily redlined to “remove all regulations that require light-duty, medium-duty, and

heavy-duty motor vehicle manufacturers and heavy-duty motor vehicle engine manufacturers to measure, report, or comply with EPA standards for greenhouse gas emissions.”³ That dense and complicated document alone will require significant time for the public and impacted stakeholders, including States, vehicle manufacturers, and participants in vehicle supply chains to review, further demonstrating that a 45-day comment period is inadequate to complete that work *and* respond to the myriad proposed determinations.

Finally, at the very least, pursuant to Clean Air Act Section 307(d)(5)(iv), the agency must extend the public comment period until 30 days after the end of the last of the public hearings on the Proposed Rule “to provide an opportunity for submission of rebuttal and supplementary information.” 42 U.S.C. § 7607(d)(5)(iv). Here, however, EPA has scheduled public hearings on the Proposed Rule for August 19 and 20, 2025, with possibility of a third on August 21, 2025, and has set a comment deadline for September 15, less than 30 days thereafter. Thus, EPA is statutorily required to keep the comment period open until at least September 22, 2025.

In sum, a 120-day comment period—or more, for reasons noted above—is necessary here in light of the scope, complexity, and impact of the Proposed Rule, EPA’s failure to provide necessary data, and the need for commenters to compile and present information on economic impacts and reliance interests for EPA’s consideration. In any event, EPA must at least extend the comment deadline to September 22, 2025, to ensure the docket remains open to comment for thirty days after the hearing.

Public Hearing Request

EPA’s plan to hold only two virtual public hearings also artificially constrains public input on the Proposed Rule. Because all States and regions of the United States are experiencing the harmful impacts of climate change, EPA should significantly increase the number of public hearings, including a combination of in-person and virtual hearings to facilitate public involvement. In particular, EPA should hold at least one public hearing in California, as the State with the highest amount of overall vehicle registrations, the highest amount of zero-emission vehicle registrations, and some of the most severe impacts from greenhouse gas pollution, as well as in Arizona, which is also experiencing some of the most severe harms

³ Memorandum from Alan Stout and Jessica Brakora to Docket EPA-HQ-OAR-2025-0194 (July 2025), <https://perma.cc/WS9U-A4UJ>.

from greenhouse gas pollution. Likewise, given the Proposed Rule’s negative impacts on the domestic zero- and low-emission vehicle manufacturing sector and related supply chains, EPA should hold public hearings in Michigan, North Carolina, and Nevada. Indeed, holding a hearing in every EPA regional office in addition to one at headquarters in D.C. would be most appropriate in light of the widespread impact of the repeal. And, again, pursuant to Clean Air Act Section 307(d)(5), the agency must extend the public comment period until 30 days after the end of the last of those public hearings.

* * *

In short, EPA is failing to provide “a meaningful opportunity” for comment on the Proposed Rule. *Prometheus Radio Project v. FCC*, 652 F.3d at 449 (“meaningful opportunity” must include “enough time with enough information to comment”) (quoting *Rural Cellular Ass’n v. FCC*, 588 F.3d 1095, 1101 (D.C. Cir. 2009)). To provide a meaningful opportunity for comment, EPA must extend the public comment period until at least 120 days after issuance of the proposed rule. In addition, consistent with the statute, EPA should adjust this revised deadline as necessary to allow at least 60 days for public input on factual material on which EPA relied or which is critical to understanding the basis of the proposal, including the updated, final DOE CWG Report, and to provide for 30 days following the holding of additional public hearings.

Sincerely,

**COMMONWEALTH OF
MASSACHUSETTS**
ANDREA JOY CAMPBELL
ATTORNEY GENERAL

/s/ Turner Smith
TURNER SMITH
Deputy Bureau Chief
Energy and Environment Bureau
MEGHAN DAVOREN
TRACY TRIPLETT
ALEXANDER WEISS
Assistant Attorneys General
LUCA GRECO
Special Assistant Attorney General
Environmental Protection Division
Office of the Massachusetts Attorney
General
One Ashburton Place, 18th Fl.
Boston, MA 02108
(617) 963-2782
Turner.Smith@mass.gov
Meghan.Davoren@mass.gov
Tracy.Triplett@mass.gov
Alexander.Weiss@mass.gov
Luca.Greco@mass.gov

STATE OF CALIFORNIA

ROB BONTA
ATTORNEY GENERAL

/s/ Theodore McCombs
THEODORE A. McCOMBS
M. ELAINE MECKENSTOCK
Deputy Attorneys General
Natural Resources Law Section
DAVID ZAFT
Acting Supervising Deputy Attorney
General
KAVITA LESSER
Deputy Attorney General
Environmental Justice & Protection
Section
California Department of Justice
600 W. Broadway, Suite 1800
San Diego, CA 92101
Theodore.McCombs@doj.ca.gov
Elaine.Meckenstock@doj.ca.gov
David.Zaft@doj.ca.gov
Kavita.Lesser@doj.ca.gov

STATE OF NEW YORK
LETITIA JAMES
ATTORNEY GENERAL

/s/ Morgan A. Costello
MORGAN A. COSTELLO
Chief, Affirmative Litigation Section
MICHAEL J. MYERS
Senior Counsel for Air Pollution and
Climate Change Litigation
RACHEL MAMAN KISH
Assistant Attorney General
Environmental Protection Bureau
NYS Office of the Attorney General
The Capitol
Albany, NY 12224
(518) 776-2392
morgan.costello@ag.ny.gov
michael.myers@ag.ny.gov
rachel.kish@ag.ny.gov

STATE OF ARIZONA
KRISTIN K. MAYES
ATTORNEY GENERAL

/s/ Kirsten Engel
KIRSTEN ENGEL
Special Attorney General
Environmental Protection Unit
2005 N. Central Ave
Phoenix, AZ 85085
(520) 209-4020
Kirsten.Engel@azag.gov

STATE OF CONNECTICUT
WILLIAM TONG
ATTORNEY GENERAL

/s/ William E. Dornbos
WILLIAM E. DORNBOS
Office of the Attorney General
165 Capitol Ave, Hartford, CT 06106
(860)-808-5250
William.Dornbos@ct.gov

STATE OF COLORADO
PHILIP J. WEISER
ATTORNEY GENERAL

/s/ Carrie Noteboom
CARRIE NOTEBOOM
Assistant Deputy Attorney General
Ralph L. Carr Judicial Center
Colorado Department of Law
1300 Broadway, 10th Floor
Denver, CO 80203
(720) 508-6285
carrie.noteboom@coag.gov

STATE OF DELAWARE
KATHLEEN JENNINGS
ATTORNEY GENERAL

/s/ Ian Liston
IAN LISTON
Director of Impact Litigation
Delaware Department of Justice
State Office Building
820 North French Street
Wilmington, Delaware 19801
(302)683-8875
Ian.Liston@delaware.gov

STATE OF ILLINOIS
KWAME RAOUL
ATTORNEY GENERAL

/s/ Jason E. James
JASON E. JAMES
Assistant Attorney General
Illinois Attorney General's Office
207 W. Pointe Dr., Suite 7
Belleville, IL 62226
(217) 843-0322
Jason.James@ilag.gov

STATE OF HAWAII
ANNE E. LOPEZ
ATTORNEY GENERAL

/s/ Lyle T. Leonard
LYLE T. LEONARD
Deputy Attorney General
465 S. King Street, #200
Honolulu, Hawaii 96813
(808) 587-3052
Lyle.T.Leonard@hawaii.gov

STATE OF MAINE
AARON M. FREY
ATTORNEY GENERAL

/s/ Emma Akrawi
EMMA AKRAWI
Assistant Attorney General
Natural Resources Division
Office of the Maine Attorney General
6 State House Station
Augusta, ME 04333
(207) 626-8800
Emma.Akrawi@maine.gov

STATE OF MARYLAND
ANTHONY G. BROWN
ATTORNEY GENERAL

/s/ Steven J. Goldstein
STEVEN J. GOLDSTEIN
Assistant Attorney General
Federal Accountability Unit
Office of the Attorney General
of Maryland
200 Saint Paul Place, 20th Floor
Baltimore, MD 21202
(410) 576-6414
sgoldstein@oag.state.md.us

STATE OF MINNESOTA
KEITH ELLISON
ATTORNEY GENERAL

/s/ Peter N. Surdo
PETER N. SURDO
Special Assistant Attorney General
Minnesota Attorney General's Office
445 Minnesota Street
Town Square Tower Suite 1400
Saint Paul, Minnesota 55101
651.757.1061 (o)
Peter.Surdo@ag.state.mn.us

**FOR THE PEOPLE OF THE STATE
OF MICHIGAN**
DANA NESSEL
ATTORNEY GENERAL

/s/ Hadley E. Tuthill
HADLEY E. TUTHILL
Assistant Attorney General
Environment, Natural Resources, and
Agriculture Division
6th Floor G. Mennen Williams Building
525 W. Ottawa Street
P.O. Box 30755
Lansing, MI 48909
(517) 335-7664
TuthillH@michigan.gov

STATE OF NEW JERSEY
MATTHEW J. PLATKIN
ATTORNEY GENERAL

/s/ Lisa J. Morelli
LISA J. MORELLI
Deputy Attorney General
New Jersey Division of Law
25 Market Street
Trenton, New Jersey 08625
Tel: (609) 376-2740
Lisa.Morelli@law.njoag.gov

STATE OF NEW MEXICO
RAUL TORREZ
ATTORNEY GENERAL

/s/ William Grantham
WILLIAM GRANTHAM
Assistant Attorney General
408 Galisteo Street
Santa Fe, NM 87501
(505) 717-3250
wgrantham@nmag.gov

STATE OF OREGON
DAN RAYFIELD
ATTORNEY GENERAL

/s/ Paul Garrahan
PAUL GARRAHAN
Attorney-in-Charge
Natural Resources Section
Oregon Department of Justice
1162 Court Street NE
Salem, Oregon 97301-4096
(503)-947-4540
Paul.Garrahan@doj.oregon.gov

STATE OF NORTH CAROLINA
JEFF JACKSON
ATTORNEY GENERAL

/s/ Asher Spiller
ASHER P. SPILLER
Senior Deputy Attorney General
RACHEL POSEY
Special Deputy Attorney General
North Carolina Department of Justice
P.O. Box 629
Raleigh, NC 27602
(919)-716-6600
aspiller@ncdoj.gov
rposey@ncdoj.gov

STATE OF RHODE ISLAND
PETER F. NERONHA
ATTORNEY GENERAL

/s/ Randelle L. Boots
RANDELLE L. BOOTS
Special Assistant Attorney General
Office of the Attorney General
Environmental and Energy Unit
150 South Main Street
Providence, RI 02903
(401) 274-4400 ext. 2122
rboots@riag.ri.gov

STATE OF VERMONT
CHARITY R. CLARK
ATTORNEY GENERAL

/s/ Hannah Yindra
HANNAH YINDRA
Assistant Attorney General
Office of the Attorney General
109 State Street
Montpelier, VT 05609
(802) 828-3186
Hannah.Yindra@vermont.gov

STATE OF WISCONSIN
JOSH KAUL
ATTORNEY GENERAL

/s/ Gabe Johnson-Karp
GABE JOHNSON-KARP
Assistant Attorney General
Wisconsin Department of Justice
17 West Main Street
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608) 267-8904
Gabe.Johnson-Karp@wisdoj.gov

STATE OF WASHINGTON
NICHOLAS W. BROWN
ATTORNEY GENERAL

/s/ Alexandria Doolittle
ALEXANDRIA K. DOOLITTLE
Assistant Attorney General
Office of the Attorney General
P.O. Box 40117
Olympia, WA 98504-0117
(360) 586-6769
Alex.Doolittle@atg.wa.gov

DISTRICT OF COLUMBIA
BRIAN L. SCHWALB
ATTORNEY GENERAL

/s/ Lauren Cullum
LAUREN CULLUM
Special Assistant Attorney General
Office of the Attorney General
for the District of Columbia
400 6th Street, N.W., 10th Floor
Washington, D.C. 20001
Lauren.Cullum@dc.gov

CITY OF CHICAGO
MARY B. RICHARDSON-LOWRY
CORPORATION COUNSEL

/s/ Bradley R. Ryba
BRADLEY RYBA
GABRIELLE SIGEL
City of Chicago Law Department
2 North LaSalle Street, Suite 540
Chicago, IL 60602
(312)-742-6432
Bradley.Ryba@cityofchicago.org
Gabrielle.Sigel@cityofchicago.org

CITY OF NEW YORK
MURIEL GOODE-TRUFANT
CORPORATION COUNSEL

/s/ Leia Seereeram
LEIA SEEREERAM
Assistant Corporation Counsel
TESS DERNBACH
Senior Counsel
New York City Law Dept.
100 Church Street
New York, NY 10007
(212) 356-4037
Lseereer@law.nyc.gov