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*Attorneys for the United States of America
and all Defendants*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

STATE OF NEVADA,

Plaintiff,

vs.

UNITED STATES; UNITED STATES
DEPARTMENT OF ENERGY; RICK
PERRY, in his official capacity as Secretary
of Energy; NATIONAL NUCLEAR
SECURITY ADMINISTRATION; and
LISA E. GORDON, in her official capacity
as Administrator of the National Nuclear
Security Administration and Undersecretary
for Nuclear Security,

Defendants.

Case No. 3:18-cv-569-MMD-CBC

**DECLARATION OF DAVID L.
NEGRI IN SUPPORT OF THE
UNITED STATES' RESPONSE TO
PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION**

1 I, David L. Negri, declare as follows:

2 1. I am the primary attorney assigned by the United States Department of Justice as
3 counsel in this matter.

4 2. Filed contemporaneously with this Declaration are true and correct copies of
5 excerpts from the following documents, provided as Exhibits in support of the United States'
6 Response to Plaintiff's Motion For Preliminary Injunction.

7 a. US Exhibit 1 -- NNSA's Supplemental Analysis, dated July 2018, for its Final
8 Complex Transformation Supplemental Programmatic Environmental Impact Statement

9 b. US Exhibit 2 -- Final Site-Wide Environmental Impact Statement for the
10 Continued Operation of the Department of Energy/ National Nuclear Security
11 Administration Nevada National Security Site and Off-Site Locations in the State of
12 Nevada (DOE 2013)

13 c. US Exhibit 3 -- Surplus Plutonium Disposition Final Environmental Impact
14 Statement (DOE 1999)

15 d. US Exhibit 4 -- Final Complex Transformation Supplemental Environmental
16 Impact Statement (DOE 2008a)

17 e. US Exhibit 5 -- Final Surplus Plutonium Disposition Supplemental Environmental
18 Impact Statement

19 f. US Exhibit 6 -- Final Site-Wide Environmental Impact Statement for Continued
20 Operation of Los Alamos National Laboratory, Los Alamos, New Mexico (DOE 2008b)

21 g. US Exhibit 7 -- Final Environmental Impact Statement for Continued Operation of
22 the Pantex Plant and Associated Storage of Nuclear Weapon Components

23 h. US Exhibit 8 -- Final Environmental Statement on the Transportation of
24 Radioactive Material by Air and Other Modes (NRC 1977)

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing
2 is true and correct to the best of my knowledge, information, and belief.
3

4 Executed on January 4, 2019

By: /s/ David L. Negri
David L. Negri

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was electronically filed with the Clerk of the Court on January 4, 2019, and served using the CM/ECF system upon the following parties/attorneys of record:

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**DECLARATION OF DAVID L. NEGRI IN SUPPORT OF THE UNITED STATES' RESPONSE
TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION – Page 3**

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