

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

J.G.G., *et al.*,

Plaintiffs-Petitioners,

V.

DONALD J. TRUMP, in his official  
capacity as President of the United States,  
*et al.*,

### Defendants-Respondents.

Civil Action No. 1:25-cv-00766

## NOTICE

The attached declaration is being submitted in response to the Court's order dated March 20, 2025, ECF No. 47.

Respectfully Submitted,

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UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

J.G.G., *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

**DECLARATION**

Civil Action No. 25-766 (JEB)

1. I am the Deputy Attorney General of the United States. I am submitting this Declaration in response to the Court's March 20, 2025 Order.

2. On March 20, 2025, the Government submitted a declaration from Robert L. Cerna II, which stated: "I understand that Cabinet Secretaries are currently actively considering whether to invoke the state secrets privilege over the other facts requested by the Court's order. Doing so is a serious matter that requires careful consideration of national security and foreign relations, and it cannot properly be undertaken in just 24 hours."

3. I attest to the accuracy of those statements based on personal knowledge of the events described by Mr. Cerna, including my direct involvement in ongoing Cabinet-level discussions regarding invocation of the state-secrets privilege.

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

Dated: March 21, 2025



Todd Blanche  
Deputy Attorney General  
United States Department of Justice