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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TZUMI INNOVATIONS, LLC,
Plaintiff/Counterclaim Defendant,

-v-

MICHAEL S. REGAN,¹ in his Official Capacity as
Administrator of the United States Environmental
Protection Agency,

Defendant,

UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY,

Defendant/Counterclaim Plaintiff.

21 Civ. 0122 (LGS)

**NOTICE OF LODGING OF
PROPOSED STIPULATION
AND ORDER OF
SETTLEMENT**

The United States of America hereby lodges with the Court the proposed Stipulation and Order of Settlement attached hereto as Exhibit 1 (the “settlement”). The United States respectfully requests that the Court not approve the settlement at this time. Rather, notice of the lodging of the

¹ Michael S. Regan, who became the Administrator of the Environmental Protection Agency on March 11, 2021, is automatically substituted for former Administrator Andrew R. Wheeler as the defendant in this action. *See* Fed. R. Civ. P. 25(d).

settlement will be published in the Federal Register, following which the United States Department of Justice will accept public comments on the settlement for a 30-day period. The settlement will be available during this comment period at <http://www.justice.gov/enrd/consent-decrees>.

After the conclusion of the public comment period, the United States will file with the Court any comments timely received, as well as responses to the comments, and at that time, if appropriate, will request that the Court approve and enter the settlement.

Dated: New York, New York
June 13, 2022

DAMIAN WILLIAMS
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