

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CENTER FOR POPULAR DEMOCRACY
ACTION and CITY OF NEWBURGH,

Plaintiffs,

v.

BUREAU OF THE CENSUS, *et al.*,

Defendants.

Case No. 1:19-cv-10917

Hon. Alvin K. Hellerstein

**SUPPLEMENTAL DECLARATION OF MICHAEL J. WISHNIE IN SUPPORT OF
PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION**

I, Michael J. Wishnie, hereby declare:

1. I am a clinical professor and supervising attorney in the Yale Law School Peter Gruber Rule of Law Clinic, which represents Plaintiffs Center for Popular Democracy Action and the City of Newburgh in this action. I submit this declaration based on my personal knowledge, information, and belief.

2. A true and correct copy of the GAO report, *2020 Census: Initial Enumeration Underway but Readiness for Upcoming Operations is Mixed*, GAO-20-368R (Feb. 2020), available at <https://www.gao.gov/assets/710/704524.pdf>, is attached as Exhibit 1.

3. A true and correct copy of excerpts of the GAO report, *2020 Census: Actions Needed to Improve In-Field Address Canvassing Operations*, GAO-18-414 (June 2018), available at <https://www.gao.gov/assets/700/692493.pdf>, is attached as Exhibit 2.

4. A true and correct copy of excerpts of the Census Bureau report, *2020 Census: Mobile Questionnaire Assistance Operation Project Plan* (Feb. 2020), available at

<https://www2.census.gov/programs-surveys/decennial/2020/program-management/2020-census-mobile-questionnaire-assistance-operation.pdf>, is attached as Exhibit 3.

5. A true and correct copy of a letter from Senator Jack Reed to Director of the Census Bureau, Steven D. Dillingham, regarding mobile questionnaire assistance (Dec. 10, 2019) is attached as Exhibit 4.

6. A true and correct copy of a letter from Director of the Census Bureau, Steven D. Dillingham, to Senator Jack Reed regarding the mobile response initiative (Aug. 12, 2019) is attached as Exhibit 5.

7. A true and correct copy of a letter from Senator Jack Reed to Director of the Census Bureau, Steven D. Dillingham, regarding questionnaire assistance (July 1, 2019) is attached as Exhibit 6.

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

Executed this 4th day of March 2020 in New Haven, Connecticut.

/s/ Michael J. Wishnie

Michael J. Wishnie