

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES, AFL-CIO,

ASSOCIATION OF ADMINISTRATIVE LAW
JUDGES, INTERNATIONAL FEDERATION OF
PROFESSIONAL AND TECHNICAL ENGINEERS
JUDICIAL COUNCIL 1, AFL-CIO,

VANESSA BARROW, GEORGE JONES, DEBORAH
TOUSSANT, and DOES 1–100,

Plaintiffs,

v.

U.S. OFFICE OF PERSONNEL MANAGEMENT, an
agency of the United States,

CHARLES EZELL, in his official capacity as Acting
Director of the Office of Personnel Management,

U.S. DOGE SERVICE f/k/a U.S. DIGITAL SERVICE,

ACTING U.S. DOGE ADMINISTRATOR,

U.S. DOGE TEMPORARY SERVICE a/k/a the
“DEPARTMENT OF GOVERNMENT EFFICIENCY,”
and

ELON MUSK, in his capacity as director of the U.S.
DOGE TEMPORARY SERVICE,

Defendants.

Case No. 1:25-cv-01237-DLC

DECLARATION OF F. MARIO TRUJILLO

I, F. Mario Trujillo, declare as follows:

1. I am an attorney licensed to practice law in the State of California and admitted pro hac vice in this matter. I help represent the Plaintiffs in this matter. I make this declaration from personal knowledge, and if called to testify, I could and would testify competently to the facts stated herein.

2. On February 14, 2025, Plaintiffs filed their Memorandum In Support Of Plaintiffs' Motion For A Temporary Restraining Order. ECF. 28.

3. On February 15, 2025, this Court ordered the parties to provide "courtesy copies of their filings and, to the extent that the filings cite to materials other than court decisions, statutes, and regulations, the parties shall include copies of those materials as well." ECF. 33.

4. Attached as exhibits to this declaration are true and correct copies of material cited in Plaintiffs' Memorandum, aside from court decisions, statutes, and regulations.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 17, 2025.

/s/ F. Mario Trujillo

F. Mario Trujillo

CERTIFICATE OF SERVICE

Counsel for Plaintiffs certify that they have sent—through Defendants’ counsel Christopher Hall at the U.S. Department of Justice Federal Programs Branch — this declaration with exhibits.

Plaintiffs’ counsel will immediately send electronically copies of the filing to Defendants’ counsel and will serve subsequent registered participants electronically and paper copies will be sent to any non-registered participants.

Plaintiffs’ counsel certifies that the foregoing was filed electronically with the Clerk of the Court for the United States District Court for the Southern District of New York by using the ECF system on February 18, 2025.

Dated: February 18, 2025

/s/ F. Mario Trujillo

F. Mario Trujillo