

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION**

SAVANNAH RIVER SITE WATCH,)
TOM CLEMENTS, THE)
GULLAH/GEECHEE SEA ISLAND)
COALITION, NUCLEAR WATCH NEW)
MEXICO, and TRI-VALLEY)
COMMUNITIES AGAINST A RADIOACTIVE)
ENVIRONMENT,)

CA: 1:21-cv-01942-MGL

Plaintiffs,)

v.)

UNITED STATES DEPARTMENT OF)
ENERGY, JENNIFER GRANHOLM, in)
her official capacity as the Secretary, THE)
NATIONAL NUCLEAR SECURITY)
ADMINISTRATION and JILL HRUBY,)
in her official capacity as the Administrator,)

Defendants.)

JOINT MOTION TO DISMISS

Pursuant to Fed. R. Civ. P. 41(a)(2), the Parties jointly move for dismissal of this case subject to two conditions: (1) Plaintiffs’ claims will be dismissed with prejudice; and (2) the Court will retain jurisdiction to resolve disputes over compliance with the terms of the Parties’ Settlement Agreement, which is being filed as an exhibit to this motion. The Parties have provided a proposed order.

Respectfully submitted this 16th day of January, 2025,

TODD KIM
ASSISTANT ATTORNEY GENERAL

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

By: s/ J. Scott Thomas

J. Scott Thomas, Trial Attorney
Esosa R. Aimufua, Trial Attorney
U.S. Department of Justice
United States Department of Justice
Environment & Natural Resources Division
150 M Street NE
Washington, DC 20002
jeffrey.thomas2@usdoj.gov

Kimberly V. Hamlett (Fed ID No. 14049)
Assistant United States Attorney
United States Attorney's Office
151 Meeting Street, Suite 200
Charleston, South Carolina 29401
Phone: (843) 266-1673
Email: Kimberly.Hamlett@usdoj.gov

Attorneys for Defendants

s/Ben D. Cunningham

Amy E. Armstrong (Fed ID No. 9625)
Leslie S. Lenhardt (Fed ID No. 7795)
Benjamin D. Cunningham (Fed ID No.
11905)

SOUTH CAROLINA ENVIRONMENTAL
LAW PROJECT
510 Live Oak Drive
Mount Pleasant, SC 29464

Attorneys for Plaintiffs