UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL LEMMON, *et al.*, *Plaintiffs*, v. **DONALD J. TRUMP**, *et al.*, *Defendants*.	Civil Action No. 26-cv-544 (TSC)
DISTRICT OF COLUMBIA AND COMMONWEALTH OF VIRGINIA, *Plaintiffs*, v. **NATIONAL PARK SERVICE**, *et al.*, *Defendants*.	Civil Action No. 26-cv-3838 (TSC) **CONSOLIDATED CASES**

NOTICE

Pursuant to the Court's Order, Dkt. 101, Defendants submit this notice regarding on-site activity that previously occurred on Memorial Circle involving painting grass. The undersigned counsel was notified by counsel for the District of Columbia at 12:04 pm today that a recent social media post reported pictures of paint lines on Memorial Circle.

After investigating, the undersigned counsel was informed by a representative from Grunley Construction Company that the lines were painted by Grunley personnel on October 31, 2026. As best can be determined at this juncture, Grunley did not have authorization from the National Park Service (NPS) to undertake the line painting.

That Grunley representative also stated that Grunley personnel visited took existing conditions photographs on Tuesday. He further confirmed that Grunley and its subcontractors will cease any further preparatory work and provide advance notice of any future work related to the project.

NPS compliance officers may periodically visit the site to prevent unauthorized activity.

The foregoing information is based on the undersigned counsel's best efforts to verify information within the timeframe for reporting set out in the Court's Order. Dkt. 101. Given the limited time provided by the Court's Order, the undersigned counsel was unable to conduct a typical inquiry necessary to submit a regular paper under Federal Rule of Civil Procedure 11(b).

Date: November 5, 2026

Respectfully submitted,

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