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

SAVANNAH RIVER SITE WATCH, TOM)	No. <u>1:21-cv-01942-MG</u> L
CLEMENTS, THE GULLAH/GEECHEE SEA)	
ISLAND COALITION, NUCLEAR WATCH)	
NEW MEXICO, and TRI-VALLEY)	
COMMUNITIES AGAINST A RADIOACTIVE)	
ENVIRONMENT,)	
)	RULE 26 INTERROGATORIES
Plaintiffs,)	
)	
V.)	
)	
UNITED STATES DEPARTMENT OF)	
ENERGY, JENNIFER GRANHOLM, in her)	
official capacity as the Secretary, The)	
NATIONAL NUCLEAR SECURITY)	
ADMINISTRATION and CHARLES VERDON,)	
in his official capacity as Acting Administrator,)	
)	
Defendants.)	
)	

Plaintiffs, Savannah River Site Watch, Tom Clements, the Gullah/Geechee Sea Island Coalition, Nuclear Watch New Mexico and Tri-Valley Communities against a Radioactive Environment, by and through their undersigned counsel, hereby answers the Court's standard interrogatories pursuant to Local Civil Rule 26.01, D.S.C., as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

None.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

This Action for declaratory and injunctive relief is brought pursuant to the Administrative Procedure Act ("APA"), 5 U.S.C §§ 701-706, and the National Environmental Policy Act ("NEPA"), 42 U.S.C. §§ 4321-4370 and therefore should be tried as a nonjury case.

- (C) State whether the party submitting these responses is a publicly-owned company.

 None of the plaintiffs in this action are publicly-owned companies.
- (D) State the basis for asserting the claim in the division in which it was filed.

Venue is proper in the Aiken Division of the Court pursuant to 28 U.S.C. § 1391(e) and Local Civil Rule 3.01(A)(2) DSC, because a substantial part of the events or omissions giving rise to the claims herein occurred at the Savannah River Site, one of the facilities impacted by this federal action. The 310 square mile Savannah River Site is located in Aiken, Barnwell and Allendale Counties in South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal?

No.

Respectfully submitted,

s/ Amy E. Armstrong

Amy E. Armstrong (Fed ID No. 9625)
Leslie S. Lenhardt (Fed ID No. 7795)
Michael G. Martinez (Fed ID No. 13431)
SOUTH CAROLINA ENVIRONMENTAL
LAW PROJECT
Mailing address:
Post Office Box 1380
Pawleys Island, SC 29585
Office address:
510 Live Oak Drive
Mount Pleasant, SC 29464

(843) 527-0078

Telephone

FAX (843) 527-0540

Attorneys for the Plaintiffs

Mount Pleasant, South Carolina