

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

APPALACHIAN VOICES, et al.,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	Civil Action No. 1:25-cv-01982-PLF
	)	
UNITED STATES	)	
ENVIRONMENTAL	)	
PROTECTION AGENCY, et al.,	)	
	)	
<i>Defendants.</i>	)	

**PLAINTIFFS' MOTION IN SUPPORT OF CLASS CERTIFICATION**

Pursuant to Federal Rule of Civil Procedure 23(a) and 23(b)(2), and Local Civil Rule 23.1(b), Plaintiffs<sup>1</sup>, on behalf of themselves and all others similarly situated, respectfully move this Court for an order certifying the following class:

All entities that received awards from the EPA authorized in whole or in part by 42 U.S.C. § 7438 which EPA then terminated after January 20, 2025 (including statutory partners). The covered awards are Environmental Justice Collaborative Problem Solving Cooperative Agreements (CFDA 66.306); Environmental and Climate Justice Community Change Grants (CFDA 66.616); Thriving Communities Grantmaking Grants (CFDA 66.615); Environmental Justice Government-to-Government Program awards awarded to non-State entities (CFDA 66.312), as well as awards to Thriving Communities Technical Assistance Centers (CFDA 66.309).

This class excludes the plaintiffs in *Sustainability Institute v. Trump*, No. 25-cv-2152-RMG (D.S.C.) or *Green & Healthy Homes Initiative, Inc. v. EPA*, No. 25-cv-01096 (D. Md.) and excludes entities whose awards were expressly terminated for identified financial or performance failures.

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<sup>1</sup> Plaintiffs include Appalachian Voices; 2C Mississippi; Air Alliance Houston; Allegheny County, Pennsylvania; Bessemer Historical Society, d/b/a Steelworks Center of the West; City of Springfield, Massachusetts; Clean Air Council; Deep South Center for Environmental Justice; Health Resources in Action; Institute for Sustainable Communities; Inter-Tribal Council of Michigan; Kalamazoo County, Michigan; King County, Washington; Lowcountry Alliance for Model Communities; Native Village of Kipnuk; Parks Alliance of Louisville; Pittsburgh Conservation Corps (Landforce); PUSH Buffalo; Sacramento, California; San Francisco, California; Treasure Island Mobility Management Agency; and WE ACT for Environmental Justice.

Plaintiffs further request that the Court appoint all named Plaintiffs as class representatives and Southern Environmental Law Center, Earthjustice, and Public Rights Project as class counsel. Plaintiffs filed a Complaint alleging that Defendants' termination of the Environmental and Climate Justice Block Grant Programs violates the U.S. Constitution's Separation of Powers and Presentment Clause, and the Administrative Procedure Act, 5 U.S.C. §§ 551 *et. seq.* For the reasons explained in the accompanying memorandum of law, Plaintiffs respectfully asks this Court to grant this motion and enter the attached Proposed Class Certification Order.

Respectfully submitted this 27<sup>th</sup> day of June 2025,

/s/ Ben Grillot

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**CERTIFICATE OF SERVICE**

I certify that on June 27, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. I further certify that arrangements have been made to deliver a true and correct courtesy copy of the foregoing to the following via Certified U.S. Mail, Return Receipt Requested:

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