

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official  
capacity as SECRETARY OF THE U.S.  
DEPARTMENT OF HEALTH & HUMAN  
SERVICES, et al.,

Defendants.

Civil Action No. 1:25-cv-00196

**DEFENDANTS' NOTICE REGARDING DECLARATION**

The attached declaration contains a correction relating to ECF No. 70-1, Declaration of Sara Patterson.

Dated: July 25, 2025

BRETT A. SHUMATE  
Assistant Attorney General  
Civil Division

ERIC J. HAMILTON  
Deputy Assistant Attorney General

CHRISTOPHER R. HALL  
Assistant Branch Director  
Civil Division, Federal Programs Branch

/s/ Elizabeth Hedges  
ELIZABETH HEDGES  
Counsel to the Assistant Attorney General  
Civil Division  
950 Pennsylvania Ave NW  
Washington, DC 20530  
Telephone: (202) 616-0929  
Email: Elizabeth.T.Hedges@usdoj.gov

*Counsel for Defendants*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official  
capacity as SECRETARY OF THE U.S.  
DEPARTMENT OF HEALTH & HUMAN  
SERVICES, et al.,

Defendants.

Civil Action No. 1:25-cv-00196

**DECLARATION OF SARA PATTERSON**

I, Sara Patterson, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am the current Acting Director of the Centers for Disease Control and Prevention's (CDC) Public Health Infrastructure Center (PHIC) and the former Acting Chief Operating Officer for the CDC, the nation's leading science-based, data-driven, service organization that protects the public's health. In the capacity of Acting Chief Operating Officer, I oversaw management, facilities, and operations at CDC and provided executive oversight for CDC's budget; facilities design, maintenance, security, management analysis, and safety and personnel security; acquisitions, contractual assistance, and grants; information technology and security; and human resources strategy, training, and workplace development. I make this declaration based on personal knowledge and information provided to me in the course of my official duties.

2. On June 17, 2025, I executed a declaration in which I described the rescission of Reduction-in-Force (RIF) notices of several hundred CDC personnel.

3. In that declaration, I stated that RIF notices had been rescinded as to, among others, employees in the Global Health Center's Division of Global HIV/AIDS and Tuberculosis (DGHT) Health Informatics, Data Management, and Surveillance Branch, as well as in its Special Initiatives Branch. I made that statement on the basis of my knowledge and belief at the time.

4. It has recently come to my attention, however, that CDC did not rescind RIF notices of employees in DGHT's Special Initiatives Branch.

5. The error in my June 17 declaration was inadvertent. I am executing this declaration to ensure that the record is accurate regarding RIF rescissions at DGHT.

6. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on July 25, 2025.

SARA S.  
PATTERSON -  
S



Digitally signed by  
SARA S. PATTERSON -S  
Date: 2025.07.25  
09:36:07 -04'00'

---

Sara Patterson  
Acting Director, Public Health Infrastructure  
Center, Centers for Disease Control and  
Prevention  
U.S. Department of Health and Human Services