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14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **SAN FRANCISCO-OAKLAND DIVISION**

17 SIERRA CLUB and SOUTHERN BORDER  
18 COMMUNITIES COALITION,

19 *Plaintiffs,*

20 v.

21 DONALD J. TRUMP, President of the United  
22 States, in his official capacity; MARK T. ESPER,  
Secretary of Defense, in his official capacity;  
23 CHAD F. WOLF, Acting Secretary of Homeland  
24 Security, in his official capacity; and STEVEN  
MNUCHIN, Secretary of the Treasury, in his  
official capacity,

25 *Defendants.*

Case No.: 4:19-cv-00892-HSG

**PLAINTIFFS' RESPONSE TO  
DEFENDANTS' RESPONSE TO THE  
COURT'S NOVEMBER 20, 2019  
ORDER REQUESTING ADDITIONAL  
INFORMATION ABOUT MILITARY  
INSTALLATIONS**

1 Nothing in Defendants' submission saves their implausible and unprecedented claims of  
2 authority. Defendants point only to traditional military facilities, including a military base built on  
3 the border between two states, and an off-site underwater training facility built specifically to serve  
4 Special Forces personnel stationed elsewhere. For the reasons stated in Plaintiffs' previous briefs,  
5 these discrete military facilities bear no resemblance to Defendants' proposed walls, which sprawl  
6 along a thousand miles of southern border, and are built for an immigration control mission that  
7 Congress explicitly assigned to a civilian agency.

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9 Dated: November 26, 2019

Respectfully submitted,

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