

Exhibit A:

Declaration of William Lawton

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE**

**OAK RIDGE ENVIRONMENTAL PEACE)
ALLIANCE, NUCLEAR WATCH OF NEW)
MEXICO, NATURAL RESOURCES DEFENSE)
COUNCIL, RALPH HUTCHISON, ED SULLIVAN,)
JACK CARL HOEFER, and LINDA EWALD,)**

Plaintiffs,

v.

**JAMES RICHARD PERRY,)
Secretary, United States Department of Energy,)
and LISA E. GORDON-HAGERTY,)
Administrator, National Nuclear Security)
Administration,)**

Defendants.

**No. 3:18-cv-00150
REEVES/POPLIN**

Declaration of William N. Lawton


1. I am submitting this declaration in support of Plaintiffs’ Combined Opposition to Defendants’ Motion for Summary Judgment and Reply in Support of Plaintiffs’ Motion for Summary Judgment.

2. As Plaintiffs’ explained in their opening Memorandum in Support of Plaintiffs’ Motion for Summary Judgment, ECF No. 53-1 at 15, “beginning in December 2018, eastern Tennessee has experienced a series of earthquakes ranging from magnitude 1.3 to 4.4, many of which were clustered in the vicinity of Y-12 and Knoxville.” Plaintiffs previously supplied a link to a United States Geological Survey (“USGS”) website as an example of one such recent earthquake and explained, *id.* at 15 n.5, that Courts may take judicial notice of government websites. *See Demis v. Sniezek*, 558 F.3d 508, 513 n. 2 (6th Cir. 2009) (taking notice of a government website).

3. The USGS provides an online earthquake mapping tool that provides information on recent earthquakes. See <https://earthquake.usgs.gov/earthquakes/search/>

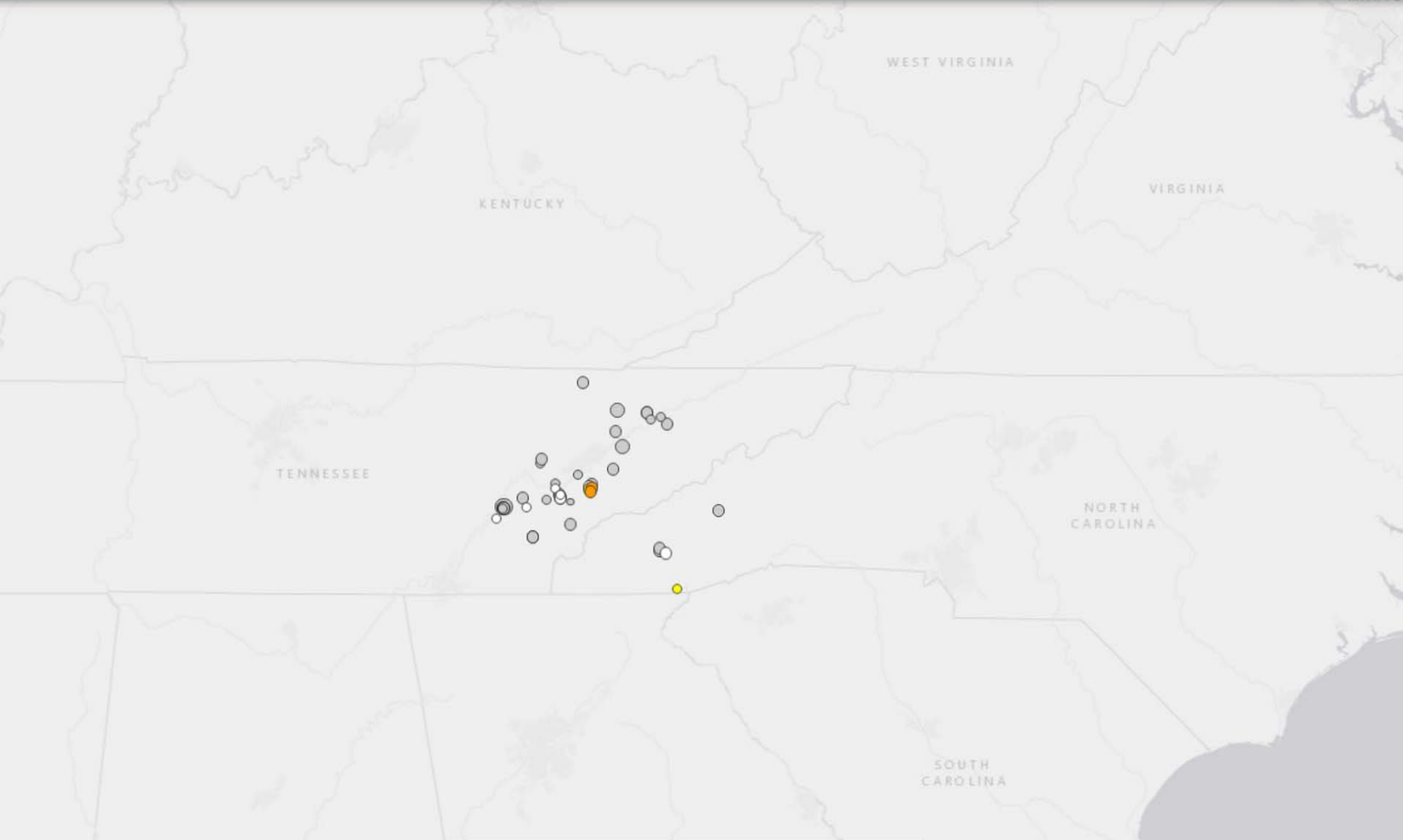
4. On April 5, 2019, I used the USGS online mapping tool to generate a map of recent earthquakes in eastern Tennessee, and an accompanying list of such earthquakes. The following are true and accurate copies of the map and list generated by the USGS website.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.



William N. Lawton

Date: April 26, 2019



Magnitude Age (past)

Hour Day Week Month Older



3.0	2018-12-16 04:12:02 (UTC)	19.7 km
1.8	10km NNE of Decatur, Tennessee 2018-12-14 01:28:19 (UTC)	4.4 km
2.5	11km NNE of Decatur, Tennessee 2018-12-14 00:24:06 (UTC)	4.6 km
2.6	4km W of Blaine, Tennessee 2018-12-13 18:46:16 (UTC)	4.8 km
1.5	10km ENE of Kingston, Tennessee 2018-12-13 15:20:39 (UTC)	17.6 km
1.8	11km NE of Decatur, Tennessee 2018-12-12 15:06:08 (UTC)	5.0 km
1.7	11km NNE of Decatur, Tennessee 2018-12-12 13:51:45 (UTC)	5.0 km
1.8	3km NW of Louisville, Tennessee 2018-12-12 12:42:31 (UTC)	19.2 km
2.1	10km NNE of Decatur, Tennessee 2018-12-12 10:41:26 (UTC)	4.4 km
1.9	11km NNE of Decatur, Tennessee 2018-12-12 09:59:25 (UTC)	6.7 km
3.0	10km NNE of Decatur, Tennessee 2018-12-12 09:27:07 (UTC)	5.8 km
4.4	12km NNE of Decatur, Tennessee 2018-12-12 09:14:43 (UTC)	7.9 km
2.3	4km WSW of Seymour, Tennessee 2018-12-09 14:22:29 (UTC)	3.7 km
2.7	12km NW of Sweetwater, Tennessee 2018-12-08 06:18:11 (UTC)	21.8 km



	2019-03-15 07:53:07 (UTC)	0.0 km
2.3	6km WNW of Greenback, Tennessee 2019-03-15 06:22:05 (UTC)	11.7 km
1.7	5km SSW of Lenoir City, Tennessee 2019-03-15 06:17:24 (UTC)	0.6 km
1.7	1km N of Decatur, Tennessee 2019-03-08 00:04:54 (UTC)	15.0 km
3.4	7km NE of Maynardville, Tennessee 2019-03-05 20:56:02 (UTC)	17.1 km
2.3	7km NW of Greenback, Tennessee 2019-02-28 15:27:35 (UTC)	0.1 km
2.0	8km SE of Rutledge, Tennessee 2019-02-26 02:18:41 (UTC)	0.1 km
1.4	6km NW of Morristown, Tennessee 2019-02-25 05:28:47 (UTC)	1.0 km
2.2	9km SSE of Coalfield, Tennessee 2019-02-22 18:14:58 (UTC)	3.9 km
2.2	1km SSW of Morristown, Tennessee 2019-02-08 08:05:02 (UTC)	0.2 km
2.5	3km E of Rutledge, Tennessee 2019-02-04 23:01:34 (UTC)	10.1 km
2.5	3km E of Rutledge, Tennessee 2019-02-04 23:01:26 (UTC)	11.5 km
1.7	2km WSW of Lenoir City, Tennessee 2019-01-25 05:03:43 (UTC)	14.8 km
1.0	3km SE of Greenback, Tennessee	