

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

ERIC LIPTON and THE NEW YORK
TIMES COMPANY,

Plaintiffs,

v.

Civil No. 17-cv-2588

UNITED STATES
ENVIRONMENTAL PROTECTION
AGENCY,

Defendant.

DISCLOSURE REQUIRED BY FED. R. CIV. P. 7.1

Certificate required by LCvR 7.1 of the Local Rules of the United States District Court for the District of Columbia:

I, the undersigned, counsel of record for Eric Lipton and The New York Times Company, certify to the best of my knowledge and belief, there are no parent companies, subsidiaries or affiliates of The New York Times Company which have any outstanding securities in the hands of the public. Grupo Financiero Inbursa, S.A.B. de C.V., an investor, owns 10% or more of The New York Times Company's stock.

These representations are made in order that judges of this court may determine the need for recusal.

Attorney of Record

/s/ David A. Schulz

David A. Schulz (Bar No. 459197)

919 3rd Avenue, 37th Floor

New York, NY 10022

Tel: (212) 850-6103

schulzd@ballardspahr.com