

## IN THE UNITED STATES COURT OF FEDERAL CLAIMS

MICHAEL J. FORBES,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 24-1953C
	)	(Judge Hadji)
THE UNITED STATES,	)	
	)	
Defendant.	)	

**MOTION TO FILE CORRECTED ADMINISTRATIVE RECORD**

Pursuant to Rule 51 of the Rules of the United States Court of Federal Claims, defendant, the United States, respectfully moves to file two videos to complete the administrative record. As we stated to the Court in our notice of filing administrative record, ECF No. 19, Mr. Forbes alerted undersigned counsel to the omission of two, short videos that properly belonged in the administrative record. Agency agreed with Mr. Forbes on the inclusion of these videos in the administrative record, and the United States conveyed to the Court that the United States would examine how to properly include the videos in the administrative record. Since this filing on April 9, 2025, the Government has had difficulty downloading the videos onto compact disks to deliver to the Court. While we understand this Court's rules require that the administrative record be filed via ECF, the videos, .EXE files, we also understand such files cannot be uploaded to ECF. Accordingly, the United States respectfully asks leave of the Court to share the videos, with all parties and the Court, via the Department of Justice's secure file-sharing system, JEFS, to complete the administrative record.

For these reasons, we respectfully request that the Court grant this motion.

Respectfully submitted,

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Director

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