

IN THE SUPREME COURT OF THE UNITED STATES

NATIONAL PARK SERVICE, ET AL.,

Applicants

v.

No. 26A____

NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED STATES**DECLARATION OF JOSHUA FISHER, DIRECTOR FOR WHITE HOUSE
MANAGEMENT AND ADMINISTRATION**

I, Joshua Fisher, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this declaration. This declaration is based on my personal knowledge and information provided to me in my official capacity by others.

2. I am the Director for White House Management and Administration ("M&A") and the Director of the Office of Administration ("OA"). In addition, I am responsible for managing the East Wing Modernization Project ("the Project") on behalf of the President of the United States. In this role, I meet regularly with the President, federal officials within the Office of the Executive Residence ("EXR") Chief Usher's Office, the United States Secret Service ("USSS"), the White House Military Office ("WHMO"), and other agencies, as well as contractors, architects, and engineers associated with the Project. The Project is being built not principally for President Trump, as construction will be completed only a short number of months before the end of his Term. Rather, the Project will primarily benefit future Presidents and world leaders who will enjoy its protections for generations.

3. Construction on the Project has been under way since October 20, 2025. The Project is currently ahead-of-schedule and under budget. To date, \$335 million of an expected \$400 million has been raised from private parties in connection with the Project, and has been donated to NPS pursuant to its donation-acceptance authority. The ballroom is funded by contributions from President Trump and some of the most prominent and successful corporations and people in America. As it stands today, on a daily basis, roughly 250 people are working on site. Construction on the Project is taking place roughly 20 hours a day, 7 days a week.

4. The Project has made remarkable progress. The concrete-and-steel superstructure is already at roof level, rising as high as 70 feet above ground in places, with a footprint of nearly 50,000 square feet and extensive above-ground works throughout. The structural foundation extends another 50 feet below ground with steel, concrete and rebar interconnecting the entire superstructure. Given the current progress, the superstructure is beyond the point of return. The freestanding concrete shear walls on-site cannot be left as-is without being tied together with the designed structural steel. These walls are engineered to work as a team—they do not have the necessary stability or strength to handle wind and heavy loads on their own. Until the structural steel is installed to connect them into one solid frame, leaving them partially built creates a major safety risk, and leaves the structure vulnerable.

5. Around 80% of the rebar has been placed, and concrete poured, for the Project. Altogether, the Project is approximately 65% finished, and it has passed the point where major changes to its design are feasible. The superstructure is scheduled to be completed by November 2026 and much of its façade will be substantially completed by April 2027. The entire Project is scheduled to be completed by August 2028. These estimates (and those below) are based on the assumption the Project will continue on schedule, and at the same pace as existing construction.

6. If the district court's injunction goes into effect, it will cause massive construction-related problems for the Project. Those problems are independent from the national-security hazards that also will accompany the injunction, and which are addressed in other declarations.

7. As indicated by the attached photos (Attachment A), construction of the underground facilities structure is nearly complete, and construction above ground is well underway. The second story of the building is presently under construction, with its above-ground features visible from the streets surrounding the White House, including Pennsylvania Avenue, Constitution Avenue, 15th Street and H Street, although not from President's Park. By way of comparison, the second attached photos (Attachment B) shows a mockup of the final design.

8. With respect to the concrete structure, we have already placed 6.4 million pounds of rebar; poured 18,000 cubic yards of concrete, this concrete is the hardest and strongest concrete there is, the type used in nuclear power plants- it is impermeable, and virtually impossible to deconstruct. The materials used, both in concrete and steel (and even glass), are meant to stop bombs, rockets, missiles, and even nuclear blasts. It is, in a very large way, a 'safe room' for the Presidency and the continuity of government. We have completed work in the Colonnade as well as the North Ballroom and are on schedule to complete the South Ballroom concrete structure by August 21st. With respect to the structural steel work, which predominately occurs above the 2nd floor ballroom level, installation has been completed in the Colonnade, and fabrication is on track for the Ballroom structural steel to commence during the month of August. In total, over 3 million pounds of structural steel have been procured and are being prepared for installation on the Project.

9. By August 21—the date when the injunction is set to go into effect under the D.C. Circuit's order—we expect to install another 1 million pounds of rebar; pour another 3,000 cubic yards of concrete; and make substantial progress on filling the remaining concrete into the structure, plus

erecting the steel for the Ballroom roof. This is consistent with a project of this scale, and the pace with which our schedule is advancing.

10. As for the façades, we have already procured 1 million pounds of steel; 58,000 square feet of glass; 60,000 pounds of aluminum finishes; and have quarried almost all of the required limestone. We have also made substantial progress on preparing the molds, panels, and other materials necessary for the façades, and have commenced fabrication of the precast concrete façade panels.

11. By August 21, we expect to make substantial progress on fabricating precast concrete façade panels, carving the limestone façade ornamentation and Corinthian columns, fabricating insulated glass window units, and preparing these building envelope materials for delivery to the site.

12. As for the mechanical, electrical, and plumbing (MEP), we have installed 5 miles worth of conduit; procured 1,700 linear feet of plumbing pipe; and installed 500 linear feet of such pipe.

13. By August 21, we expect to install another mile of conduit; another 300 linear feet of plumbing pipe; and to have installed another 200 linear feet of such pipe.

14. As the above indicates, the Project has progressed efficiently and expeditiously, with a substantial amount of its work already completed. At our current pace, the structure should be substantially finished by November 2026, the facades by April 2027, and the commissioning of mechanical systems will commence in early 2028. Key features of the Project are finished and installed, including all below grade structures, the grand staircase structure, kitchen structure, and Colonnade movie theatre structure. Mechanical and electrical rough-in is progressing in all areas below the ballroom level, including in the kitchen, FLOTUS suite, and the below-grade mission spaces.

15. If work is ordered to stop, severe construction-related problems will follow—again, separate and apart from the national-security problems that others have detailed.

16. As for the structure and facade, if work is stopped for an extended period of time, the free-standing walls currently constructed will not be permanently tied-in to the forthcoming roof structure, leading to susceptibility to strong winds during extreme weather. There is a significant risk of water intrusion into the below-grade spaces and the adjacent White House residence. In the ordinary course, the Construction team can take measures to mitigate the effects of wind and weather during construction until the project is fully watertight; however, in the event of an extended stoppage, the Project will be susceptible to damage. The site is in an unfinished state and is also vulnerable to soil erosion and the deterioration of foundational elements. In short, the structure has made significant progress, but cannot be largely left alone at this point, and if we have to do that, it will endure tremendous setbacks that will fundamentally compromise the integrity of everything currently built there.

17. As for building systems, including the mechanical, electrical, and plumbing work, the temporary facilities in place are not equipped for long-term use, leaving the site without a stable power source, thus putting at risk, among other things, critical infrastructure and important HVAC work (which if left unaddressed, could lead to potential bacteria growth and other hazards within the structure or at/around the site).

18. In short, if work is stopped in line with the district court's injunction, it will be a disaster. Quite frankly, if the building were tragically ordered to be taken down, or even altered, by the court, there would be no way to do so. The Project is considerably on its way to being completed, with critical steps already finished. Stopping now—after so much foundational work having been finished—is beyond impractical. It will degrade and compromise what has already been done, to

the point where it is uncertain that the significant work completed to date will even be usable for whatever building is allowed to occupy the site. Pausing work now, as the district court has ordered, will jeopardize everything we have done so far; and depending on how long that freeze persists, it might force us to tear down everything we have done as a degraded mass, to allow for whatever comes next—something that would be disruptive and extremely dangerous.

19. None of this is meaningfully redressed by the district court's purported exception for national-security-related construction. The Project is an integrated whole, where each major aspect works in tandem with another. Should the structure or façade be stalled, it risks water contamination everywhere else. If we cannot pour concrete and lay steel in line with the Project's current plans, then we cannot do the electrical work necessary to install heating and air-conditioning systems that will (among much else) prevent contaminating mold, freezing lines, or degradation within the building. Without a water-tight building, we cannot install the critical infrastructure required to make below-ground facilities operational. The Project follows a single coherent design, and we have built consistent with that design for months. Its core pieces cannot be disentangled now. Work has progressed too far to go back to the drawing board.

20. I have worked closely on this project and have the highest opinion of its final appearance. This building is already being adjudged to be one of the most beautiful of its kind, anywhere in the country. To that end, the Supreme Court of the United States and, in particular, its magnificent Corinthian columns—considered the highest column order in architecture—have served as the inspiration for the monumental columns that front the military/ballroom complex. These columns are made from the highest-grade Indiana limestone, which was shipped to Italy, and are being carved by some of the greatest artists anywhere in the world. Delivery and installation will begin shortly.

21. I declare that the foregoing is true and correct to the best of my knowledge.

Dated: August 13, 2026



Joshua Fisher
Director for White House Management and Administration
Director of the Office of Administration
Executive Office of the President