

1 **IN THE UNITED STATES DISTRICT COURT**

2 **FOR THE DISTRICT OF COLUMBIA**

3 JUDICIAL WATCH .  
 4 Plaintiff, .  
 vs. . Docket No. CA 18-491-RBW  
 5 U.S. DEPARTMENT OF JUSTICE . Washington, D.C.  
 . June 14, 2018  
 6 Defendant. .  
 . . . . .x 11:00 a.m.

7  
8 TRANSCRIPT OF STATUS CONFERENCE

9 BEFORE THE HONORABLE SENIOR JUDGE REGGIE B. WALTON

10 UNITED STATES DISTRICT JUDGE

11 APPEARANCES:

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24 Proceedings recorded by machine shorthand, transcript  
25 produced by computer-aided transcription.

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**P R O C E E D I N G S**

THE DEPUTY CLERK: Your Honor, this morning this is In re: Judicial Watch versus the U.S. Department of Justice. This is Civil Action 18-491. Ask the parties to step forward and identify yourselves for the record, please.

MS. COTCA: Good morning, Ramona Cotca for Judicial Watch, and at counsel's table is Tom Fenton on behalf of Judicial Watch.

THE COURT: Good morning.

MR. GERARDI: Good morning, your Honor. Michael Gerardi on behalf of the Department of Justice. And with me at counsel table is Marcia Berman, also from the Department of Justice and Timothy Zeese [phonetic] and Brian Flanagan from OIP.

THE COURT: Good morning. What exactly is the information that you're seeking to acquire from the government?

MS. COTCA: Meaning the FOIA request?

THE COURT: Yes.

MS. COTCA: So the FOIA request ask for communications between the Attorney General's office from, and one individual, a third party, Nellie Ohr, who was with Fusion GPS. And the time frame is from January 1, 2015 to December --

THE COURT: One moment. January 1, 2015 to what?

1 MS. COTCA: December 12, 2017.

2 THE COURT: And who is this woman? What's this  
3 entity Fusion?

4 MS. COTCA: Fusion GPS is the entity that hired  
5 Christopher Steele, who authored the dossier about Donald  
6 Trump, and that was I believe publicized later after the new  
7 administration came in power in 2017. Fusion GPS hired  
8 Nellie Ohr to work on, for the purposes of doing the  
9 opposition research for, on Donald Trump the president now.  
10 And all of this was financed by the DNC. Nellie Ohr -- I'm  
11 sorry?

12 THE COURT: Who is she, and what is her position?

13 MS. COTCA: Right. Nellie Ohr worked for Fusion  
14 GPS. And the relationship with the DOJ is that her husband,  
15 Bruce Ohr, was working. He was a high official at the  
16 Department of Justice during this time. And so that is why  
17 there's a lot of public interest with respect to  
18 communications between the Department of Justice and Nellie  
19 Ohr.

20 THE COURT: And has the government obtained  
21 information about the request that's being made responsive  
22 to information? Government, have you able to identify  
23 responsive records that would satisfy the FOIA request?

24 MR. GERARDI: To date, we have not been able to  
25 identify responsive records, your Honor. Part of the reason

1 for that is the, this is a -- part of the reason we're here  
2 is to schedule the time frame in which the government has to  
3 complete its search for records and to form a production  
4 schedule. And the dispute we're having is of the time that  
5 search for records will take. So we haven't identified  
6 records yet, but our search is ongoing.

7 THE COURT: And how long do you think it's going  
8 to take you to determine if there are responsive documents?

9 MR. GERARDI: Well, as we proposed in our status  
10 report, our initial proposal is to -- the initial proposal  
11 we put in the status report is to search custodians who  
12 worked in the office of the Attorney General during, from  
13 the range basically January 1, 2016 to January 20, 2017, so  
14 basically when the administration changed over.

15 That is a significant number of custodians. And  
16 given OIP's current backlog of requests and you know, they  
17 obviously have to handle requests that are in litigation and  
18 then a significant number of requests that are not the  
19 subject of litigation, we've proposed a schedule of six  
20 months in order to complete those, the searches of those  
21 individuals.

22 THE COURT: What's the workload that they have  
23 now?

24 MR. GERARDI: Well, your Honor, as we set out in  
25 page 6 and 7 of our status report the current backlog of

1 requests is quite significant. I have some updated figures  
2 I received from the agency this morning, but the total, the  
3 total backlog of the agency as of today for all of its  
4 tracks. Meaning there's different tracks the cases fall  
5 under is around 1700 requests. And as our status report  
6 noted there's a significant number of complex track requests  
7 like this one that are ahead of it in the queue and that  
8 includes litigation cases and non-litigation cases.

9 THE COURT: How many people are assigned to do  
10 this?

11 MR. GERARDI: Your Honor, I don't know if I have  
12 an answer to that question in terms of like the number of  
13 staff OIP have assigned to do this. I have representatives  
14 from OIP at counsel --

15 THE COURT: Can somebody tell me how many people?  
16 Because I get very frustrated with the government because  
17 Congress in its wisdom created this law, which is a good  
18 law, but yet I constantly have the government telling me  
19 they only have a limited number of people to do the searches  
20 for this information. And it seems to me if Congress is  
21 going to enact laws they need to provide the means by which  
22 the agencies can do the work.

23 MR. GERARDI: Give me a moment to confer with --

24 THE COURT: Yes.

25 [Brief pause.]

1           MR. GERARDI: Your Honor, OIP's current staff is  
2 11 individuals.

3           THE COURT: And they're all doing these records  
4 searches? Let me get somebody up here who can talk to me  
5 who knows what's going on.

6           MR. GERARDI: Give me just a moment, your Honor.

7           THE COURT: All right.

8           [Brief pause.]

9           THE COURT: Yes. Your name?

10          MR. SWANSON: Brian Flanagan. The initial request  
11 staff has 11 people and the initial request staff handles  
12 all incoming requests and the processing of those requests  
13 to completion. The requests -- different people handle them  
14 at different phases, but that is the size of the team that  
15 handles initial requests.

16          THE COURT: Thank you. You wanted to say  
17 something?

18          MS. COTCA: Well responsive to that, that was part  
19 of the joint status report and I just wanted to address that  
20 point, that to the Court.

21                 Judicial Watch would say 11 people, and yet the  
22 Department of Justice has represented that they have an  
23 influx of the FOIA requests. If there's such an influx then  
24 perhaps the agency should commit more people to handle the  
25 increase in the FOIA requests. Eleven people for the entire

1 Department of Justice is a very, very, very small  
2 percentage.

3 But initially, I mean I also just want to address  
4 with respect to what my opposing counsel said for the  
5 search. My understanding to date has been that the  
6 Department of Justice has not even begun the search, that  
7 it's just in queue. And --

8 THE COURT: When did you submit your request?

9 MS. COTCA: The request was submitted in December,  
10 I believe December 12 of 2017. Hence, the cutoff date for  
11 the search, so it's already been six months. The Department  
12 of Justice is asking another six months to do the search.  
13 And to some degree -- but in addition they're also trying to  
14 modify the FOIA request. They are not searching for the  
15 entire timeframe that Judicial Watch had asked. And it's  
16 reasonable. They have not made the argument that the FOIA  
17 request is not reasonable, that it's unduly burdensome. The  
18 FOIA --

19 THE COURT: And it dates back to?

20 MS. COTCA: January 1st, 2015.

21 THE COURT: And the basis for dating back to that  
22 date?

23 MS. COTCA: We know that Fusion GPS was working  
24 with Nellie Ohr on the opposition research. And date going  
25 back to 2015, one year prior is more than reasonable to

1 request records for one year before. We're not going back  
2 to 2010. And I believe --

3 THE COURT: Was she with Fusion at that time?

4 MS. COTCA: We don't have that information.

5 Perhaps the Department of Justice has that information.  
6 Judicial Watch does not have the information of when she was  
7 hired. We do know that the dossier was being created in  
8 2016. So therefore our rationale is let's seek records for  
9 the year prior. And then December 12, 2017, which is right  
10 before Bruce Ohr was dismissed from the department, was let  
11 go from his position at the Department of Justice. So that  
12 is the rationale for the time frame of the request. We  
13 tried to limit it as much as possible.

14 THE COURT: Does the government know when she  
15 started working with Fusion GPS?

16 MR. GERARDI: Your Honor, we don't have -- our  
17 research to date doesn't indicate that there are records  
18 from that time frame.

19 THE COURT: Well they're requesting that the  
20 search date back to January 1st, 2015, and you're saying it  
21 should start some time in 2016. Why do you disagree with  
22 their position?

23 MR. GERARDI: So if I can take a step back. It's,  
24 what we've proposed is to prioritize the search of 2016. I  
25 think plaintiff has acknowledged this individual was



1 involved in opposition research during the presidential  
2 campaign. The presidential campaign obviously takes place  
3 in 2016. And so we propose to prioritize that part of the  
4 search in order to get to the, I think the heart of their  
5 request faster.

6 Obviously if something came up in the search of  
7 2016 records that suggested there was a reason to believe  
8 records existed prior to that we continue, we would  
9 obviously look into that and maybe consider expanding the  
10 search team, consider that timeframe.

11 THE COURT: But why should what you find regarding  
12 2016 dictate whether you look at 2015?

13 MR. GERARDI: Well, it doesn't necessarily dictate  
14 it, but it might provide a basis to -- it might provide a  
15 basis --

16 THE COURT: It seems to me the better approach  
17 would be if you're saying you think it be more fruitful to  
18 search 2016, to do that search to try and get that  
19 information, but then subsequent to that then look at 2015  
20 if you're saying 2016 is going to have the most fruitful  
21 information.

22 MR. GERARDI: Right. And we prioritize the search  
23 to search 2016 first. But say that something you discovered  
24 something in the records from that to suggest there was  
25 communication going further back that might be a reason to

1 continue searching for 2016 records.

2 THE COURT: My question is: Why are you taking  
3 2015 off the table and except if you find something related  
4 to 2016?

5 MR. GERARDI: Because we're trying to -- I mean  
6 part of the reason for the proposal was to try and keep the  
7 search time at a minimum. We've conferred with OIP this  
8 morning since the status report. We think that we can do  
9 that search of 2016 records that we've proposed in about  
10 four and a half months. And I think that that's the fastest  
11 way to get to the core of what the plaintiff's request is is  
12 about. And I think based on that we'll have information  
13 that will allow us to better determine whether a 2015 search  
14 of records is appropriate.

15 I don't think I've answered your question though.

16 THE COURT: I just don't understand, and it seems  
17 to me they have a good faith basis for believing that a  
18 search for records related to 2015 would be appropriate. So  
19 I just don't see how you predicate whether you're going to  
20 search 2015 based upon what you find in 2016. I think it's  
21 fine if you're saying you think it's going to be more  
22 fruitful to do 2016 first and then do 2015 thereafter. I  
23 don't have a problem with that. I just don't see how you  
24 can say well, what we find regarding 2016 is going to  
25 predicate whether we think we need to do a search for 2015.

1           MR. GERARDI: I mean I think I've explained why.  
2 I think that this 2016, I mean maybe we just don't --

3           THE COURT: I don't have a problem with that. If  
4 you think the information that they're looking for is  
5 probably going to be found in records from 2016, to do that  
6 first, and then once you finish that then do 2015. That's  
7 fine.

8           MR. GERARDI: Yeah, and I think that's what we  
9 proposed. The real reason it comes up as an issue is as we  
10 met and conferred about this schedule one kind of proposes a  
11 way to focus the search to narrow the search time was to  
12 focus on 2016. The difference between 2015 and 2016 though  
13 doesn't, didn't get the plaintiffs to where they were trying  
14 to get to in terms of the time frame of the schedule.

15           THE COURT: Well, is she correct that up to this  
16 point there hasn't been any search conducted?

17           MR. GERARDI: I would disagree with that.  
18 Obviously, we've been trying to determine what the core of  
19 custodians that we are going to search is, and we've been  
20 meeting and conferring with them over that. I would  
21 consider that part of the search.

22           If you mean by that has OIP like actually gone and  
23 done the email search that has not been done yet. This  
24 process that we're having, meeting and conferring and trying  
25 to identify who the right people to search are is part of

1 the search.

2 THE COURT: Well the process of actual searching  
3 the emails when will that start?

4 MR. GERARDI: I don't know precisely when it would  
5 start. What I do know is that the time it would take to  
6 complete it within the backlog that OIP is currently dealing  
7 with, and that we've set forth our position on that.

8 THE COURT: I think if it's been almost, since  
9 December when the initial request was made more should have  
10 been done by now. And it seems to me if you have someone  
11 who's going to come into office and they say they're going  
12 to be a disrupter, that they should appreciate there's going  
13 to be a lot of FOIA requests and therefore, should gear up  
14 to deal with those requests. So I'm not real sympathetic to  
15 the position that you have limited staff and therefore, you  
16 can't comply with these requests. Because I think it should  
17 have been anticipated that you were going to get inundated  
18 with requests when you have somebody who says they're going  
19 to come in and totally be a disrupter.

20 So I think you're going to have to get some more  
21 people. I mean, I understand a lot of positions aren't  
22 being filled in the government, so you just need to get more  
23 people. I mean FOIA is considered to be very important. I  
24 keep getting from the government, from various agencies we  
25 can't do this, we can't do that because we don't have the

1 resources. I'm not real sympathetic to that. FOIA is  
2 important. Open government is important, and government has  
3 to comply with FOIA in order to make it an open government.

4 What I will do is I'll continue the matter for two  
5 months. I'll require that you all start immediately doing  
6 the checks that need to be done, and that this information  
7 be provided on a rolling basis. I'll have you all back in  
8 two months. I expect to see that the search has been begun  
9 and records if they exists are starting to be produced.

10 MR. GERARDI: Thank you, your Honor.

11 THE COURT: Anything else?

12 MS. COTCA: I just want to clarify for the Court  
13 that we don't have an issue with respect to how the  
14 Department of Justice wants to prioritize the search. We  
15 just want to make sure that the search is conducted for the  
16 entirety of the FOIA request. And I would like to remind  
17 the Court as well that we're also seeking records from 2017,  
18 and that request as well was made --

19 THE COURT: Like I said, I don't have a problem  
20 with them taking the position that they believe it's going  
21 to be more fruitful to look at 2016 first, but I don't think  
22 they can take off the table 2015 or 2017, based upon what  
23 they find regarding 2016.

24 MS. COTCA: Correct. It's our position they're  
25 trying to chip away at the actual request.

1 THE COURT: I don't think they can do that.

2 MS. COTCA: And that's plaintiff's position as  
3 well. Thank you.

4 THE COURT: Very well. The 20th of August.

5 MR. GERARDI: May I be heard briefly?

6 THE COURT: Yes.

7 MR. GERARDI: Obviously out of -- we respect your  
8 ruling today on this issue. In terms of how the Department  
9 of Justice focuses its search may defend that search, the  
10 eventual search it decides to undertake, that's obviously  
11 not an issue for you to, that's going to be decided today.  
12 That is an issue for summary judgment based on the agency's  
13 determination of what a reasonable search is.

14 THE COURT: Right.

15 MR. GERARDI: There are other reasons for, there  
16 are other substantive reasons for focusing the search the  
17 way we have including the Attorney General's recusal of  
18 matters related to the 2016 election. And regardless of  
19 what search we do undertake we obviously have the right to  
20 defend whatever search we do undertake as reasonable at  
21 summary judgment. I didn't understand you to say that  
22 obviously.

23 I just want to make it clear that there are other  
24 reasons that the agency has beyond perimeters and discussion  
25 today about why these searches are reasonable. And the

1 agencies obviously reserve the right to defend the  
2 reasonableness of its search at the appropriate time.

3 THE COURT: Understood. The 20th of August?

4 MS. COTCA: Your Honor, may I just respond to that  
5 briefly?

6 THE COURT: Yes. Actually the 21st would be  
7 better. But go ahead, I'm sorry.

8 MS. COTCA: That's okay. While I have this out.  
9 Plaintiff is okay.

10 THE COURT: 10:30, okay. Yes, you wanted to say  
11 something?

12 MS. COTCA: Yes. Obviously there's a time for  
13 summary judgment briefing, but plaintiff's position is -- I  
14 mean, the motion itself has to be nonfrivolous, so if the  
15 Justice Department is going to just continue to take its  
16 position that they're not going to search for the entirety  
17 of the FOIA request, I don't even know how this Justice  
18 Department can get to summary judgment motion if they're  
19 going to refuse to conduct a search for 2017 and 2015.

20 There has to be a good faith basis in submitting  
21 that the department is entitled to summary judgment.

22 THE COURT: I can't obviously project. Obviously,  
23 as I said before I think it would be appropriate to  
24 prioritize searching the 2016 records. And I can't, I don't  
25 see how they take off the table 2015 and 2017, but if they

1 say based upon what they found in 2016 supports the position  
2 they shouldn't have to do the other search that's something  
3 I'll have to address.

4 MS. COTCA: Okay.

5 THE COURT: Thank you.

6 MS. COTCA: Thank you, your Honor.

7 [Thereupon, the proceedings adjourned at 11:23  
8 a.m.]

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CERTIFICATE

I, Cathryn J. Jones, an Official Court Reporter for the United States District Court of the District of Columbia, do hereby certify that I reported, by machine shorthand, the proceedings had and testimony adduced in the above case.

I further certify that the foregoing 16 pages constitute the official transcript of said proceedings as transcribed from my machine shorthand notes.

In witness whereof, I have hereto subscribed my name, this the 26th day of June, 2018.

/s/\_Cathryn J. Jones  
Cathryn J. Jones, RPR  
Official Court Reporter

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|---|---|--|
| <p><b>MR. GERARDI:</b> [21]<br/> <b>MR. SWANSON:</b> [1] 6/9<br/> <b>MS. COTCA:</b> [19]<br/> <b>THE COURT:</b> [41]<br/> <b>THE DEPUTY CLERK:</b> [1] 2/1</p>  | <p><b>A</b><br/> <b>a.m</b> [2] 1/6 16/8<br/> <b>able</b> [2] 3/22 3/24<br/> <b>about</b> [6] 3/5 3/21 10/9 10/12 11/10 14/25<br/> <b>above</b> [1] 17/6<br/> <b>acknowledged</b> [1] 8/25<br/> <b>acquire</b> [1] 2/16<br/> <b>Action</b> [1] 2/4<br/> <b>actual</b> [2] 12/2 13/25<br/> <b>actually</b> [2] 11/22 15/6<br/> <b>addition</b> [1] 7/13<br/> <b>address</b> [3] 6/19 7/3 16/3<br/> <b>adduced</b> [1] 17/5<br/> <b>adjourned</b> [1] 16/7<br/> <b>administration</b> [2] 3/7 4/14<br/> <b>after</b> [1] 3/6<br/> <b>agencies</b> [3] 5/22 12/24 15/1<br/> <b>agency</b> [4] 5/2 5/3 6/24 14/24<br/> <b>agency's</b> [1] 14/12<br/> <b>ahead</b> [2] 5/7 15/7<br/> <b>aided</b> [1] 1/25<br/> <b>all</b> [7] 3/10 5/3 6/3 6/7 6/12 13/5 13/7<br/> <b>allow</b> [1] 10/13<br/> <b>almost</b> [1] 12/8<br/> <b>already</b> [1] 7/11<br/> <b>also</b> [4] 2/12 7/3 7/13 13/17<br/> <b>another</b> [1] 7/12<br/> <b>answer</b> [1] 5/12<br/> <b>answered</b> [1] 10/15<br/> <b>anticipated</b> [1] 12/17<br/> <b>any</b> [1] 11/16<br/> <b>Anything</b> [1] 13/11<br/> <b>APPEARANCES</b> [1] 1/11<br/> <b>appreciate</b> [1] 12/12<br/> <b>approach</b> [1] 9/16<br/> <b>appropriate</b> [4] 10/14 10/18 15/2 15/23<br/> <b>are</b> [15] 4/8 4/17 4/18 5/7 5/9 7/14 8/17 10/2 11/19 11/25 13/9 14/15 14/16 14/23 14/25<br/> <b>aren't</b> [1] 12/21<br/> <b>argument</b> [1] 7/16<br/> <b>around</b> [1] 5/5<br/> <b>as</b> [14] 4/9 4/24 5/3 5/5 8/13 8/13 11/9 11/9 13/17 13/18 14/2 14/20 15/23 17/8<br/> <b>ask</b> [2] 2/4 2/20<br/> <b>asked</b> [1] 7/15<br/> <b>asking</b> [1] 7/12<br/> <b>assigned</b> [2] 5/9 5/13<br/> <b>Attorney</b> [5] 1/12 1/15 2/21 4/12 14/17<br/> <b>Attorney-at-Law</b> [2] 1/12 1/15<br/> <b>August</b> [2] 14/4 15/3<br/> <b>authored</b> [1] 3/5<br/> <b>Avenue</b> [2] 1/17 1/22<br/> <b>away</b> [1] 13/25</p> | <p><b>be</b> [20]<br/> <b>because</b> [5] 5/16 5/16 10/5 12/16 12/25<br/> <b>been</b> [11] 3/24 7/5 7/11 11/16 11/18 11/19 11/23 12/8 12/10 12/17 13/8<br/> <b>before</b> [4] 1/9 8/1 8/10 15/23<br/> <b>begun</b> [2] 7/6 13/8<br/> <b>behalf</b> [2] 2/8 2/11<br/> <b>being</b> [3] 3/21 8/7 12/22<br/> <b>believe</b> [5] 3/6 7/10 8/2 9/7 13/20<br/> <b>believing</b> [1] 10/17<br/> <b>Berman</b> [1] 2/12<br/> <b>better</b> [3] 9/16 10/13 15/7<br/> <b>between</b> [3] 2/21 3/18 11/12<br/> <b>beyond</b> [1] 14/24<br/> <b>Branch</b> [1] 1/16<br/> <b>Brian</b> [2] 2/13 6/10<br/> <b>Brief</b> [2] 5/25 6/8<br/> <b>briefing</b> [1] 15/13<br/> <b>briefly</b> [2] 14/5 15/5<br/> <b>Bruce</b> [2] 3/15 8/10<br/> <b>burdensome</b> [1] 7/17</p>  |
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