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11 Counsel for the Congressional Defendants

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **SOUTHERN DIVISION**

15 JOHN C. EASTMAN

16 Plaintiff,

17 vs.

18 BENNIE G. THOMPSON, *et al.*,

19 Defendants.

Case No. 8:22-cv-00099-DOC-DFM

NOTICE

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- 22 1. Pursuant to this Court’s January 26, 2022 Order, Defendants Bennie G.
- 23 Thompson and the Select Committee to Investigate the January 6th Attack
- 24 on the United States Capitol (collectively, the “Select Committee”) hereby
- 25 submit their response to Plaintiff’s March 24 privilege log entries.
- 26 2. Simultaneously with this Notice, the Select Committee is filing under seal
- 27 Plaintiff’s March 24 privilege log with a column indicating the Select
- 28 Committee’s objections to Plaintiff’s privilege claims.

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3. The Select Committee preserves its argument that, as a general matter, none of the documents contained in the Chapman University production set can be withheld on the basis of attorney-client or work product privilege.
4. As reflected in the privilege log filed under seal simultaneously with this Notice, the Select Committee objects that Plaintiff has not provided sufficient information to determine the validity of Plaintiff's privilege assertions. Without the requested information, the Select Committee cannot fully assess the validity of Plaintiff's privilege claims.
5. The Select Committee notes that although Plaintiff has provided revised privilege logs for certain days containing further information regarding certain entries, the additional information provided does not fully resolve the noted deficiencies.

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Respectfully submitted,

/s/ Douglas N. Letter

DOUGLAS N. LETTER

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Counsel for Congressional Defendants

Dated: March 29, 2022

CERTIFICATE OF SERVICE

WASHINGTON, DISTRICT OF COLUMBIA

I am employed in the aforesaid county, District of Columbia; I am over the age of 18 years and not a party to the within action; my business address is:

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On March 29, 2022, I served the **NOTICE** on the interested parties in this action:

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(BY E-MAIL OR ELECTRONIC TRANSMISSION)

The document was served on the following via The United States District Court – Central District’s CM/ECF electronic transfer system which generates a Notice of Electronic Filing upon the parties, the assigned judge, and any registered user in the case:

(FEDERAL) I declare under penalty of perjury that the foregoing is true and correct, and that I am employed at the office of a member of the bar of this Court at whose direction the service was made.

Executed on March 29, 2022 here, at Bethesda, Maryland.

/s/ Douglas N. Letter