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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

JOHN C. EASTMAN

Plaintiff,

vs.

BENNIE G. THOMPSON, *et al.*,

Defendants.

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

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PLAINTIFF'S STATUS REPORT

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Plaintiff hereby submits the following status report to the Court:

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1. Plaintiff has now completed the privilege review ordered by this Court.
 2. The review began with 21,396 documents totaling 94,153 pages identified by Chapman as meeting the Select Committee's search terms.
 3. With the agreement of the Select Committee, 11,437 documents, totaling 29,140 pages, were culled from the production as mass mailings.
 4. Of the remaining 9,959 documents and 65,013 pages, Dr. Eastman produced 6,035 documents totaling 25,319 pages, and then another 24 documents totaling 231 pages in response to objections by Defendants.
 5. In accord with his ethical obligations "[t]o maintain inviolate the confidence, and at every peril to himself ... to preserve the secrets, of his ... client," Cal. Bus. &

1 Prof. Code § 6068(e)(1); *see also* D.C. Rules of Professional Conduct 1.6(a), Dr.
2 Eastman asserted various privileges over 3,907 documents totaling 40,656 pages,¹
3 including attorney-client privilege and work product protection involving 65
4 different clients or potential clients.
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7 6. Defendants made no objection to Dr. Eastman's claims of privilege over 643
8 documents totaling 3,006 pages,² but did object to every claim of attorney-client
9 privilege and work-product protection that Dr. Eastman asserted with respect to his
10 representation of former President Trump and/or his campaign committee. Those
11 3,264 documents, totaling 37,650 pages, have therefore been submitted for *in*
12 *camera* inspection pursuant to this Court's order of January 26, 2022. Of those,
13 111 documents generated between January 4 and 7, 2021, totaling 336 pages, have
14 already been considered *in camera* by this Court. Dr. Eastman has produced 101
15 of those documents, totaling 315 pages, (plus another 4 documents/16 pages which
16 were duplicates) for which this Court sustained the Select Committee's objections
17 to Dr. Eastman's assertions of privilege, but this Court overruled the Selection
18 Committee's objections with respect to the remainder.
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23 7. In sum, of the 21,396 documents / 94,153 pages identified by Chapman University
24 as response to the Select Committee's subpoena (as amended by the Select
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27 ¹ 6 documents, totaling 1,192 pages, were produced with privilege materials redacted, and hence both produced and listed on
28 privilege logs.

² There are two more days of privilege logs to which the Select Committee's objections, if any, have not yet been submitted.
These numbers include estimates for the final two days, based on the Committee's prior objections.

1 Committee's list of search terms), Dr. Eastman has produced or (at the Select
2 Committee's request) culled 17,496 documents / 55,020 pages and asserted
3 privilege over an additional 643 documents / 3,006 pages to which the Select
4 Committee did not object. The Court has upheld privilege claims over 10
5 documents, totaling 21 pages. The Select Committee's objections to Dr.
6 Eastman's claims of privilege over the remaining 3,247 documents / 36,106 pages
7 remain pending.³

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11 April 18, 2022

Respectfully submitted,

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14 */s/Anthony T. Caso*

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³ These numbers may be slightly off, due to some overlap between documents that met the Select Committee's request to cull and those already produced.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this filing has been served on opposing counsel by email.

By: /s/ Charles Burnham
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