

PUBLIC VERSION

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

YANPING CHEN,

**Plaintiff,**

v.

**FEDERAL BUREAU OF INVESTIGATION,  
U.S. DEPARTMENT OF JUSTICE, U.S.  
DEPARTMENT OF DEFENSE, and U.S.  
DEPARTMENT OF HOMELAND SECURITY,**

**Defendants.**

**Civil Action No. 1:18-cv-03074**

**PLAINTIFF YANPING CHEN'S APPLICATION FOR AN ORDER TO SHOW CAUSE  
WHY NON-PARTY CATHERINE HERRIDGE SHOULD NOT BE FOUND IN CIVIL  
CONTEMPT FOR DEFIANCE OF THE COURT'S AUGUST 1, 2023 ORDER**

Pursuant to this Court's inherent powers, Plaintiff Yanping Chen, through undersigned counsel, hereby applies to this Court for an order to show cause why non-party Catherine Herridge should not be found in civil contempt for violating the Court's August 1, 2023 Order denying Herridge's motion to quash Plaintiff's deposition subpoena and directing Herridge to sit for a deposition and answer questions concerning the identity and intent of the source or sources of the documents and images allegedly provided to Herridge in violation of the Privacy Act.

Pursuant to Local Rule 7(m), undersigned counsel has conferred with counsel for Herridge, who has advised that Herridge will oppose this motion.

**PUBLIC VERSION**

Dated: October 30, 2023

Respectfully submitted,

*/s/ Andrew C. Phillips*

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