IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

PETER P. STRZOK,)
Plaintiff,)) Civil Action No. 19-2367 (ABJ)
V.)
ATTORNEY GENERAL MERRICK B. GARLAND, in his official capacity, <i>et al.</i> ,)))
Defendants.)
)
LISA PAGE,)
Plaintiff,)) (: '14 (' N 10 2675 (TOC)
V.) Civil Action No. 19-3675 (TSC)
U.S. DEPARTMENT OF JUSTICE, et al.,)
Defendants.)
) _)
ATTORNEY GENERAL MERRICK GARLAND, in his official capacity; UNITED STATES DEPARTMENT OF JUSTICE, FBI DIRECTOR CHRISTOPHER A. WRAY, in his official capacity; and FEDERAL BUREAU OF INVESTIGATION,)))))))
Movants,))
V.) Case No.: 1:22-mc-27 (ABJ)
PETER P. STRZOK)
IN RE SUBPOENA SERVED ON DONALD J. TRUMP))
	J

DEFENDANTS' NOTICE REGARDING EXECUTIVE PRIVILEGE

Defendants submit this notice pursuant to the Court's February 23, 2023 Minute Order, in

which the Court authorized depositions of FBI Director Christopher Wray and former President

Donald Trump to proceed, subject to limitations as to scope and duration. The Executive Office of

the President will not assert the Presidential Communications Privilege, and Defendants will not

assert the Deliberative Process Privilege, with respect to the authorized topics. This notice is

limited to the deposition topics authorized by the Court during the February 23, 2023 hearing, and

Defendants reserve all rights with respect to privilege assertions as to all other topics during the

remainder of discovery and at any trial.¹

As part of Defendants' review of the authorized topics, counsel for Defendants made a

representative of former President Trump aware of the Court's Minute Order. Former President

Trump has not requested an assertion of privilege over any of the information within the scope of

the authorized depositions.

Dated: March 24, 2023

Respectfully submitted,

BRIAN D. NETTER

Deputy Assistant Attorney General

MARCIA BERMAN

Assistant Branch Director

CHRISTOPHER R. HALL

Assistant Branch Director

/s/ Bradley P. Humphreys BRADLEY P. HUMPHREYS

(D.C. Bar 988057)

¹ Defendants expressly reserve their rights to seek further review of this Court's February 23, 2023 decision regarding Defendants' motion to quash Mr. Strzok's subpoena for the deposition of former President Trump, including, if appropriate, through mandamus relief. Nothing in this

notice should be construed as a waiver or forfeiture of those rights.

1

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