

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

BARBARA J. LEE, ET AL.,	)	
	)	
Plaintiffs,	)	
	)	CV No. 21-400
vs.	)	Washington, D.C.
	)	March 12, 2024
DONALD J. TRUMP, ET AL.,	)	2:30 p.m.
	)	
Defendants.	)	
	)	

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TRANSCRIPT OF JOINT STATUS CONFERENCE PROCEEDINGS  
BEFORE THE HONORABLE AMIT P. MEHTA  
UNITED STATES DISTRICT JUDGE

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Proceedings recorded by mechanical stenography; transcript produced by computer-aided transcription

1 PROCEEDINGS

2 COURTRROOM DEPUTY: All rise. This Honorable Court  
3 is now in session. The Honorable Judge Amit P. Mehta  
4 presiding.

5 Please be seated and come to order.

6 THE COURT: Please be seated, everyone.

7 COURTRROOM DEPUTY: This is Civil Action 21-400,  
8 Civil Action 23-038, Civil Action 21-586, Civil Action  
9 21-858, Civil Action 21-2265; Barbara Lee, et al., versus  
10 Donald Trump; Sandra Garza versus Donald Trump, et al.;  
11 Eric Swalwell versus Donald Trump; James Blassingame,  
12 et al., versus Donald Trump; and Conrad Smith, et al.,  
13 versus Donald Trump, et al.

14 Counsel, please approach the podium and state your  
15 appearances for the record.

16 MR. SELLERS: Good afternoon, Your Honor.  
17 Joseph Sellers representing the plaintiffs in the Lee versus  
18 Trump case.

19 THE COURT: Mr. Sellers.

20 MR. CASPAR: Good afternoon, Your Honor.  
21 Edward Caspar for the plaintiffs in Smith versus Trump.

22 THE COURT: Mr. Caspar.

23 MR. MALONE: Good afternoon, Your Honor.  
24 Patrick Malone for the Blassingame plaintiffs.

25 And with me is Kristy Parker for Blassingame.

1 THE COURT: Mr. Malone.

2 MR. ANDONIAN: Good afternoon, Your Honor.

3 Phil Andonian on both the Swalwell and Garza matters.

4 I'm joined in the courtroom by my colleague  
5 Matthew Kaiser, and my colleague Mark Zaid on the Zoom.

6 THE COURT: Mr. Andonian, welcome.

7 Okay. Mr. Warrington?

8 MR. WARRINGTON: Good afternoon, Your Honor.

9 David Warrington for President Trump, along with my  
10 colleagues from Dhillon Law, Jonathan Shaw and Gary  
11 Lawkowski, and Mr. Jesse Binnall from the Binnall Law Group.

12 THE COURT: Welcome back, everyone.

13 Okay. So just to reset the table here, we were  
14 together a few weeks ago to talk about steps forward. I had  
15 urged the parties to sort of meet and confer and try and  
16 hammer out a framework which might include stipulations of  
17 fact, and then I asked the parties to sort of report in a  
18 Joint Status Report, which I have received and reviewed last  
19 week.

20 The upshot is, at least the defense is not  
21 prepared, for various reasons, to agree to any stipulations  
22 at this point, and so we're sort of kind of back to where we  
23 were, it seems to me, two weeks ago.

24 Let me just start with you, Mr. Warrington.

25 I guess what I take away from your submission is,

1 I guess, two things:

2 One is, you obviously believe, and I don't think  
3 it's without foundation, that any admissions at this point  
4 or even unsworn representations, would implicate Fifth  
5 Amendment issues, one. And, two, that, because of that, you  
6 think these proceedings ought to be stayed. And, I suppose,  
7 three, you do think there's some additional discovery that  
8 could proceed involving third parties.

9 I guess what I'm still uncertain about is what  
10 that looks like to you; in other words, I still don't have a  
11 sense of what you think the discovery is that you will need.  
12 And, you know, there were some sort of general suggestions  
13 about, you know, subpoenaing records from agencies and the  
14 like last time, but it's still not clear to me exactly what  
15 precisely you think you need to get done in terms of  
16 discovery and what's needed from third parties that wouldn't  
17 infringe upon any Fifth Amendment privileges.

18 MR. WARRINGTON: Your Honor, I think,  
19 specifically, I'll take one example, and we kind of  
20 highlighted it in our Status Report, the Twitter account,  
21 many of the proposed stipulations.

22 And I want to be clear with the Court: We took a  
23 long time looking at this issue and, in good faith, tried to  
24 figure out if there was some way we could come to an  
25 accommodation.

1           The intervening sort of, I'll call it, development  
2 was the fact that the Supreme Court took the immunity  
3 question in the criminal case, and it's highly -- or it's  
4 precisely within the gambit of the question presented in  
5 that case is: Official acts. So likely that ruling in that  
6 case is going to come down to give some guidance as to what  
7 an official act is, and that's the issue we're teed up here  
8 in the immunity question in the civil case. So what I'm  
9 talking about with regard to the Twitter account, I think  
10 we'd need information from who had access to it, who  
11 controlled it, how was it used.

12           The National Archives has records related to the  
13 Twitter account. The Second Circuit has said that that's --  
14 you know, the Twitter account under certain circumstances is  
15 an official government avenue of speech. So those are the  
16 kinds of things that I think with regard to the Twitter  
17 account we tried to highlight as an example of one of the  
18 areas of inquiry we would conduct on discovery.

19           Same thing with the President's participation at  
20 the January 6th rally. How did that come about? I know the  
21 plaintiffs have said, well, the January 6th report contains  
22 all of that. I can -- that is not a complete record. And  
23 obviously since it is something that's loaded with hearsay,  
24 as the Court recognized at the last hearing, we would get to  
25 probe beyond that, so we'd want to take discovery of people



1 that were involved in that.

2 Some of those people may still be working in the  
3 White House, government staff that facilitate the  
4 President's appearance at that event. Those are the sorts  
5 of things that I envision. And as I offered before, to lay  
6 that out in sort of broad context. But going so far as to  
7 stipulate as to specific facts, that's where the problem  
8 comes in.

9 And I think there was a way forward when we were  
10 standing up here last time that I proposed, which would be  
11 similar to discovery in any other case, because it's done  
12 sort of out in the open. We'd send the third-party  
13 subpoena, they'd get a copy of the third-party subpoena.  
14 They'd send a third-party subpoena. We'd see what each  
15 other was doing. So there's nothing -- there's no hiding  
16 the ball there. It's just that's the process that I think  
17 would give them the visibility on what we were trying to do.

18 THE COURT: I mean, do you think you would be in a  
19 position to answer a simple interrogatory that asks:  
20 Please explain your theory of why you believe  
21 President Trump was acting in an official capacity with  
22 respect to the acts alleged in the case?

23 MR. WARRINGTON: No, not with the current pending  
24 criminal case.

25 And I would also say that that question really

1 couldn't be answered in the context of that official act  
2 question being precisely before the Supreme Court, because  
3 whatever the Court says on that issue is likely going to  
4 shape a defense or a response to that question.

5 THE COURT: I guess my reaction is twofold; one  
6 it's -- maybe. I don't know what the Court is going to do;  
7 none of us have a crystal ball.

8 MR. WARRINGTON: None of us do.

9 THE COURT: They could theoretically say, we don't  
10 need to reach the question of what's an official act or  
11 isn't, because there is no official acts immunity from  
12 criminal prosecution. That's one possibility.

13 But at least as of now, we've got what the Circuit  
14 has said. So we've got pretty clear demarcations from the  
15 Circuit about how they view things, and maybe the  
16 Supreme Court will agree or disagree. So we already have a  
17 framework.

18 Look, I think the other issue here is that it's  
19 difficult to move it all forward. And I think the  
20 plaintiffs are right about this. And I think you would  
21 hopefully agree, to -- for them to be in a position to sort  
22 of defend against what you are preparing to argue without  
23 actually providing some framework or thinking.

24 I mean, just as any party who would be bearing the  
25 burden on any particular issue would have to explain the

1 facts that support whatever position they're advancing in an  
2 interrogatory response, for example, you know, it seems to  
3 me the same ought to apply here and -- because otherwise,  
4 I'm not sure what guidance they have in terms of thinking  
5 about discovery for their purposes. So I'm not -- you know,  
6 help me figure out a way to work through that logjam.

7 MR. WARRINGTON: Well, Your Honor, absent the  
8 criminal proceeding, I would not have anything to dispute  
9 with sort of what your framework is.

10 But the fact that that criminal proceeding is  
11 pending, counsels for a stay in this case. And that's what  
12 we've asked for is a briefing schedule to argue that the  
13 discovery should be stayed as to President Trump, and that  
14 would include the immunity to discovery at this time, too.

15 So if we were to answer an interrogatory about  
16 what's the basis of our defense with regard to official act  
17 immunity in the civil context, that certainly goes to the  
18 facts that, I think, would be relevant in the criminal case.  
19 And that's what the cases counsel against, and counsel has  
20 reasons to grant the stay.

21 And the Court, as this Court has done in numerous  
22 instances while other parallel criminal proceedings are  
23 going on, granted a stay for those very purposes.

24 So that's why I can't stand here and say yes,  
25 I can answer that question.

1           THE COURT: A couple questions; I guess one  
2 observation, one question.

3           I mean, I understood that you all were going to  
4 file something sooner than what you've proposed in your  
5 Status Report. So we can talk about that in a moment.

6           But, secondly, you haven't articulated to me, at  
7 least in the Status Report, how long you would be seeking a  
8 stay.

9           You mentioned the Georgia case, for example; that  
10 case isn't even set for trial yet.

11           So do you have any sense of what you'll be asking  
12 for when you do ask?

13           MR. WARRINGTON: I would say the stay would have  
14 to be at least concurrent with the criminal matter that's on  
15 these particular facts and these issues most -- sorry to  
16 say, the Special Counsel's case.

17           THE COURT: They overlap completely, at least the  
18 Special Counsel's case, I think, essentially is co-extensive  
19 in many respects.

20           And then the Georgia case is essentially a piece  
21 of what these folks have alleged and what the Special  
22 Prosecutor's alleged.

23           MR. WARRINGTON: I'm less concerned about the  
24 Georgia case than I am about the Special Counsel's case.  
25 And I think that the Special Counsel's case has a likelihood

1 of being over quicker just --

2 THE COURT: You may have more insight on this than  
3 the rest of us.

4 MR. WARRINGTON: I don't claim to have any extra  
5 insight, but it seems to me that that would be moving along  
6 quicker than what I've observed in Georgia.

7 THE COURT: Right.

8 MR. WARRINGTON: But that's why we -- and  
9 certainly if the Court decides -- wants us to brief the stay  
10 quicker, we're happy to do that.

11 We think it's -- the stay is the appropriate  
12 mechanism here. Unfortunately, I don't -- none of us  
13 control the other case, but we do believe that it warrants a  
14 stay for all the reasons that we've stated previously.

15 THE COURT: Okay. Thanks, Mr. Warrington.

16 So, Mr. Sellers, I guess the first question for  
17 you -- and I don't mean to preempt whatever else you'd like  
18 to say, and that is, given the posture we're in, how do we  
19 get through this without at least me resolving the stay  
20 issue first?

21 Because it seems to me that what you really care  
22 about is getting a position from them, and that would either  
23 mean actually getting a position or an invocation of the  
24 Fifth, and the Fifth could only be invoked if I denied their  
25 stay. So it seems to me to be kind of a threshold question

1 that I would need to grapple with, but I'm happy to hear  
2 your thoughts.

3 MR. SELLERS: Yeah.

4 Your Honor, I think in the end, we come to the  
5 conclusion that you were positing, but let me just make a  
6 few observations before then.

7 First of all, as the Court is aware, the  
8 D.C. Circuit ruled in the appeals from this case. And  
9 President Trump declined to seek review in that case, so we  
10 are left with the D.C. Circuit decision as controlling  
11 precedent here.

12 None of us knows what the Supreme Court may do  
13 with respect to the criminal indictment immunity issue. As  
14 you know, in another Court in this building, the Court ruled  
15 that there was no immunity available from a criminal  
16 indictment, and D.C. Circuit unanimously held that same way.  
17 So, you know, we -- I think the criminal case in our view  
18 has a parallel track. I don't necessarily think -- we  
19 necessarily think it will necessarily involve the issues  
20 here.

21 The example that counsel gave in their -- in the  
22 Status Report is, I think, particularly telling, because we  
23 simply ask them to stipulate that the particular Twitter  
24 statements, where it came from, President Trump's private  
25 account.

1           They responded by saying something about the  
2 Second Circuit ruling as to whether that was a partially  
3 official account and the like.

4           That's the argument that goes to the merits of the  
5 issues of whether it's an official action or not. It's not  
6 the question factually. It's hard to see how there's much  
7 dispute that that came from President Trump's private  
8 Twitter account.

9           So there is definitely discovery that we think can  
10 be done. And I thought the Court's proposal that we proceed  
11 with these stipulations was a very valuable suggestion. As  
12 you know, we proceeded down that path and ultimately  
13 couldn't make any progress.

14           So if there's -- if ultimately we're going to be  
15 stymied by any ability to get -- and I'd say one final  
16 thing, which is: We're not convinced that there will be  
17 need for much discovery eventually, as there's a lot of  
18 material out there. And before anybody should undertake  
19 discovery, we think there ought to be some careful  
20 examination of what's publicly available from the  
21 January 6th Commission and other places.

22           This case has been here for three years, I know  
23 you're aware of that, and so, you know, our clients really  
24 want to move this ahead as quickly as possible. If it's  
25 necessary to have a ruling on the stay motion, we'd ask that

1 the Court set an expedited briefing schedule and attend to a  
2 ruling as quickly as it can.

3 But we just maintain that there are facets of this  
4 fact gathering that we think could be undertaken. And one  
5 of them is the example you proposed, but it may be more  
6 efficient to rule on the stay motion -- request. And then  
7 if the Court grants a stay, so be it. And if the Court  
8 denies it, then that no longer encumbers us in discussing  
9 how to proceed with the fact gathering here.

10 THE COURT: I guess I should have shared one more  
11 observation with Mr. Warrington, and that is, I mean, I did  
12 look through the proposed stipulations, and it wasn't --  
13 I would readily concede that some of them would necessarily  
14 implicate a potential Fifth Amendment privilege, but not  
15 all.

16 You know, there are some, for example, facts  
17 surrounding who funded the January 6th rally, who organized  
18 it, et cetera. It's not clear to me that those really do  
19 implicate any Fifth Amendment privileges, and those --  
20 frankly, those kind of facts really are central to moving  
21 this forward, it seems to me. And so whether, you know, how  
22 we do this and -- remains to be seen, I think.

23 But one possibility is that if third-party-type  
24 discovery goes forward, you know, that could include some  
25 number of interrogatories directed to the defendant that, at



1 least at first blush, might not indicate a Fifth Amendment  
2 privilege, but I'll just throw that out there as an  
3 additional step that we can think about.

4 MR. SELLERS: Well -- sorry, didn't mean to  
5 interrupt you.

6 THE COURT: Go ahead.

7 MR. SELLERS: If the Court were to deny the stay  
8 request, we can take up the issue of whether there's certain  
9 discrete discovery requests that they may legitimately claim  
10 could implicate a Fifth Amendment interest. And if there's  
11 a dispute, we can bring it to the Court's attention, but we  
12 can't even get there.

13 THE COURT: Right.

14 MR. SELLERS: And until we get past this issue  
15 about the implications of the Supreme Court decision and  
16 anything else they want to assert, I'm not sure we're going  
17 to make a lot of progress.

18 We read the authority in this area as requiring a  
19 pretty particularized showing to justify this kind of broad  
20 stay, and we don't see any basis that they've offered so far  
21 that would justify it. So we think that may be where we're  
22 left.

23 THE COURT: I mean, we may need, once the briefing  
24 is filed, to have a conversation about this.

25 But I guess, Mr. Sellers, are you disputing that

1 discovery here directed at Mr. Trump would not implicate  
2 Fifth Amendment interests?

3 MR. SELLERS: Well, if you're asking, when you say  
4 "directed at President Trump," do you mean a deposition of  
5 President Trump?

6 THE COURT: I mean, anything, whether it's  
7 interrogatories, requests for admissions, deposition, any of  
8 those three that would require some responses under oath.

9 MR. SELLERS: Yes.

10 I mean, I think it's hard to see how some -- at  
11 least some of the stipulations we proposed will necessarily  
12 cause him to implicate potentially Fifth Amendment  
13 interests.

14 I don't -- I guess we don't agree that any sworn  
15 statement by President Trump would necessarily implicate  
16 Fifth Amendment interests. I think it would have to be  
17 taken up in a -- specifically, and we may argue about  
18 whether they will inevitably have that effect.

19 THE COURT: Right, right.

20 That's all contextual, which is fair, but, you  
21 know, the allegations here are essentially co-extensive with  
22 what the Special Counsel has alleged.

23 MR. SELLERS: In some respects.

24 And let me just say that, keeping in mind that the  
25 issue we're dealing with right now is immunity, not with the

1 issue of ultimate liability. I know there's overlap, but  
2 there are some differences.

3 THE COURT: Okay. All right.

4 Anyone else wish to be heard?

5 Mr. Caspar?

6 MR. CASPAR: Edward Caspar for the plaintiffs in  
7 Smith versus Trump.

8 And I should say that we have online  
9 William Blechman, counsel for the plaintiffs, and  
10 Marc Epstein here in the courtroom, also counsel for  
11 plaintiffs.

12 Your Honor, I would just like to address maybe one  
13 misperception about what's before the Supreme Court.

14 The issue of what acts are official and what are  
15 not actually is not before the Supreme Court. The  
16 Supreme Court took that out when it revised the issue before  
17 the Court. So it assumes that the acts under consideration  
18 before the Supreme Court are official acts and then it poses  
19 the question of whether there's immunity from criminal  
20 liability for those official acts.

21 But that opinion from the Supreme Court, when it  
22 comes down, isn't going to shed any light on whether acts  
23 can be official or not official. So that's not -- we have a  
24 D.C. Circuit opinion on that and other case law, but that's  
25 not before the Supreme Court.

1           And I would just urge the Court on the question of  
2 the stay, I think Your Honor is correct that that just has  
3 to be resolved before we can move forward.

4           I want to note that Defendant Trump mentioned his  
5 desire to file a motion for the stay two weeks ago when we  
6 had a status conference, and he still hasn't done it. So  
7 we'd ask that the Court order it to be made without further  
8 delay. Thank you, Your Honor.

9           THE COURT: Thank you.

10           All right. Anyone else on the plaintiffs' side  
11 wish to be heard? Okay.

12           Mr. Warrington, anything else from you?

13           MR. WARRINGTON: No, Your Honor.

14           THE COURT: All right.

15           I think we're all in vigorous agreement that we  
16 need to resolve the stay issue first; that is, without  
17 prejudice to either side, commencing whatever third-party  
18 discovery you think you'd like to take, as that really is  
19 not -- that really is not what is the sticking point.

20           So, Mr. Warrington, can you have something on file  
21 by next Tuesday? That's a week from today?

22           MR. WARRINGTON: Yes, Your Honor.

23           THE COURT: Okay.

24           Mr. Sellers, how long do you want for your  
25 opposition?

1 MR. SELLERS: I think a week, Your Honor, would  
2 suffice. We could file by the 19th.

3 THE COURT: Well, he's filing by the 19th, so  
4 you'll file by the --

5 MR. SELLERS: I'm sorry, seven days later.

6 THE COURT: Okay. The 26th.

7 And then I'll just ask for a reply brief, if you'd  
8 like to file one, by April 2nd.

9 MR. WARRINGTON: April 2nd. Thank you,  
10 Your Honor.

11 THE COURT: All right.

12 So that's how we'll proceed.

13 Is there anything else we need to discuss while  
14 we're all together?

15 MR. SELLERS: Not for the plaintiffs.

16 MR. WARRINGTON: Nothing for the defendant.

17 THE COURT: Okay. All right. Thank you, all,  
18 very much. Look forward to your filings.

19 COURTROOM DEPUTY: All rise.

20 This court is adjourned.

21 (Proceedings concluded at 3:00 p.m.)  
22  
23  
24  
25

C E R T I F I C A T E

I, William P. Zaremba, RMR, CRR, certify that the foregoing is a correct transcript from the record of proceedings in the above-titled matter.

Date: March 12, 2024



William P. Zaremba, RMR, CRR

<p><b>COURTROOM</b>  <b>DEPUTY: [3]</b> 5/2 5/7 21/19  <b>MR. ANDONIAN: [1]</b> 6/2  <b>MR. CASPAR: [2]</b> 5/20 19/6  <b>MR. MALONE: [1]</b> 5/23  <b>MR. SELLERS: [11]</b> 5/16 14/3 17/4 17/7 17/14 18/3 18/9 18/23 21/1 21/5 21/15  <b>MR. WARRINGTON: [13]</b> 6/8 7/18 9/23 10/8 11/7 12/13 12/23 13/4 13/8 20/13 20/22 21/9 21/16  <b>THE COURT: [28]</b></p>	<p><b>4</b>  <b>400 [2]</b> 1/4 5/7  <b>408-4604 [1]</b> 1/15  <b>454-2809 [1]</b> 3/14  <b>4582 [1]</b> 2/10  <b>4604 [1]</b> 1/15  <b>5</b>  <b>500 [1]</b> 1/14  <b>574-1206 [1]</b> 4/12  <b>579-4582 [1]</b> 2/10  <b>586 [1]</b> 5/8  <b>6</b>  <b>608 [1]</b> 4/11  <b>640-2850 [1]</b> 3/9  <b>662-8318 [1]</b> 2/5  <b>6th [4]</b> 8/20 8/21 15/21 16/17  <b>7</b>  <b>700 [1]</b> 3/13  <b>703 [2]</b> 4/12 4/17  <b>717 [1]</b> 4/15  <b>742-1500 [1]</b> 4/5  <b>8</b>  <b>800 [1]</b> 4/4  <b>8318 [1]</b> 2/5  <b>858 [1]</b> 5/9  <b>888-1943 [1]</b> 4/17  <b>8th [1]</b> 3/8  <b>9</b>  <b>900 [1]</b> 2/4  <b>953-9850 [1]</b> 3/5  <b>9850 [1]</b> 3/5  <b>A</b>  <b>ability [1]</b> 15/15  <b>about [19]</b> 6/14 7/9 7/13 8/9 8/20 10/15 10/20 11/5 11/15 12/5 12/23 12/24 13/22 15/1 17/3 17/15 17/24 18/17 19/13  <b>above [1]</b> 22/4  <b>above-titled [1]</b> 22/4  <b>absent [1]</b> 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