

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,
By the U.S. Department of Justice
1100 L Street NW
Washington, D.C., 20001

Plaintiff,

–v.–

PETER K. NAVARRO,
801 Pennsylvania Avenue NW
Unit 1021
Washington, D.C., 20004

Defendant.

Case No. 1:22-cv-2292

JOINT STATUS REPORT

By Memorandum Order and Judgment dated March 9, 2023, this Court ordered, *inter alia*,
that:

Defendant shall produce to Plaintiff the 200 to 250 documents that his counsel has identified as Presidential records forthwith, and that on or before thirty days after the entry of this Order, the parties shall meet and confer to discuss the search terms and methodology used, or to be used, to unequivocally identify Presidential records in Defendant’s possession. If the parties reach agreement on the search terms and methodology, their implementation to identify records should thereafter proceed, and all Presidential records identified thereby shall be expeditiously produced.

ECF 15; *accord* 1:22cv2292 (March 28, 2023 Minute Order) (stating that the March 9th Order “remains in effect” and that parties’ status report to the Court remains due on April 8, 2023)

(emphasis omitted).¹ In conformance with this Court's Orders, the parties hereby file this joint status report and propose as follows:

1. Defendant has begun the process of conducting searches to capture all Presidential Records Act (PRA) records in his possession. Defendant will search all email accounts on which he conducted official business, which includes, but is not necessarily limited to, his ProtonMail account. *See* Compl. ¶¶ 6, 40. Defendant's search will include, but is not necessarily limited to, a search for all electronic messages as defined by 44 U.S.C. 2209(c)(2), and would include all texts messages, chats, and email that relate to Defendant's official duties.

2. Defendant will first search his email for all correspondence with a .gov or .mil domain. Defendant will use these results to conduct a search for any emails with those individuals' personal email accounts, as well as a search of text messages and chats (if any exist).

3. Defendant will also search for all electronic messages (and/or accompanying attachments) that he has sent to or received from anyone that relate to his official duties.

4. The parties agree that Defendant will complete all searches for PRA material by May 8, 2023.

5. The parties will file a joint status report by May 15, 2023 that will propose a schedule and deadlines setting forth the timing and manner by which Defendant will process and transfer PRA records in his possession to Plaintiff.

Dated: April 8, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

¹ As of the filing of this status report, Plaintiff advises that it has not received any of the 200 to 250 documents that Defendant's counsel has identified as Presidential records, nor has Defendant obtained a stay of this Court's order from the D.C. Circuit.

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/s/ Lee Reeves

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