

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

HERITAGE FOUNDATION,

MIKE HOWELL,

Plaintiffs,

v.

U.S. DEPARTMENT OF JUSTICE,

Defendant,

and

JOSEPH R. BIDEN, JR.,

Defendant-Intervenor.

Case No. 1:24-cv-00645 (DLF)

**DEFENDANT’S NOTICE OF SUBMISSION OF THE ZWONITZER MATERIALS TO
THE COURT FOR IN CAMERA REVIEW**

On June 8, 2026, this Court entered an order that directed as follows: “on or before noon on June 9, 2026, the defendant shall provide the Court with a copy of the Zwonitzer materials --as the defendant intends to release them to the plaintiffs -- for an in camera review.” In accordance with this Court’s order, Defendant today delivered a set of the Zwonitzer materials (redacted recordings and transcripts) in read-through format so that the Court can review the redactions. It is the Defendant’s intention that the transcripts and recordings would be produced to plaintiffs with the redactions applied.

DATED: June 9, 2026

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General
Civil Division

ELIZABETH J. SHAPIRO
Deputy Branch Director
Federal Programs Branch

/s/ John J. Halloran, Jr.
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CERTIFICATE OF SERVICE

On June 9, 2026, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court for the District of Columbia, using the electronic case filing system of the Court.

/s/ John J. Halloran, Jr.

JOHN J. HALLORAN, JR.

Trial Attorney

United States Department of Justice