

# Exhibit 2



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**By Federal Express**

May 13, 2024

Colleen Shogan  
Archivist of the United States  
National Archives & Records Administration  
700 Pennsylvania Avenue, NW  
Washington, DC 20408

Jack Smith  
Special Counsel  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

**Touhy Authorization to Produce Documents Material to the Defense  
of Former White House Chief of Staff Mark R. Meadows  
in *State v. Trump*, No. 23SC18894 (Ga. Sup. Ct., Fulton Cnty.)**

Archivist Shogan and Special Counsel Smith:

Mr. Terwilliger and I write on behalf of our client, former White House Chief of Staff Mark R. Meadows, regarding the production of certain documents in the possession of the United States, specifically the National Archives and the Department of Justice, which are material to his defense in *State v. Trump*, No. 23SC18894 (Ga. Sup. Ct., Fulton Cnty.).

The Superior Court in that case has issued a Certificate of Need under the Uniform Act to Secure the Attendance of Witnesses, which is attached here. Contemporaneously with the transmission of this letter, we are filing and serving an application in the Superior Court of the District of Columbia, pursuant to D.C. Code § 23-1502 to enforce that Certificate. The purpose of this proceeding is to secure testimony from you or your designees as custodians of records or to secure the production of documents in lieu of such testimony. Exhibits A & B to Mr. Meadow's state-court petition, which are incorporated by reference into the Certificate and set forth the documents sought, are also attached.

Mr. Meadows is entitled to these documents in preparation of his defense by law and as a matter of fundamental fairness and constitutional due process. To the extent that you believe authorization to produce these documents is necessary, *see United States ex rel.*

Meadows Touhy Request


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*Touhy v. Ragen*, 340 U.S. 462 (1951), we ask that you construe this letter and the enclosed exhibits as a request for such authorization under the applicable regulations for the National Archives, see 36 C.F.R. § 1251.1 *et seq.*, and the Department of Justice, see 28 C.F.R. § 16.21 *et seq.* We do not believe, however, that these regulations or the principle announced in *Touhy* in any way limits Mr. Meadows's right to secure these documents for use in his defense.

Please do not hesitate to contact me should you have any questions about these requests, should you believe there is anything else necessary to request authorization, or to arrange for the production of the requested documents.

Sincerely,

A handwritten signature in blue ink, appearing to read "John S. Moran", with a long horizontal flourish extending to the right.

John S. Moran

*Counsel to Mark R. Meadows*

cc: George J. Terwilliger, III, Terwilliger Law PLLC

James Durham, Griffin Durham Tanner Clarkson LLC

Gary Stern, General Counsel, National Archives & Records Administration

Betsy Shapiro, Deputy Director, Federal Programs Branch, Civil Division, U.S. Department of Justice