IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JOYCE BEATTY,

Plaintiff,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Civil Action No. 25-4480 (CRC)

DEFENDANTS' STATUS REPORT

Pursuant to the Court's September 25, 2026 Minute Order, Defendants here provide a "further status report on the temporary closure and emergency repairs" currently in effect and ongoing at the John F. Kennedy Center for the Performing Arts ("the Center").

Matt Floca, a knowledgeable representative of the Kennedy Center and signatory of the attached declaration, *see* Oct. 2 Floca Decl., ordered a "temporary operational closure" of the main building of the Center on September 16, 2026, *id.* ¶ 3. On September 23, 2026, Mr. Floca extended that closure, which remains in effect as of today. *See id.* ¶ 4. The closure "continues to be reviewed on a weekly basis." *Id.* Mr. Floca describes a final report issued by the engineering firm Walter P Moore on September 25, 2026, which is attached as Exhibit A to his declaration, that affirms earlier findings made about soffit-panel deterioration at the Center. *See id.* ¶¶ 6–7; *see also* Ex. A to Oct. 2 Floca Decl. In light of that report, Mr. Floca's "continuing assessment" to the operational status of the Center is that public access to areas "under and adjacent to the soffits" must be restricted, which means that options for emergency egress from the building must be reassessed. Oct. 2 Floca Decl. ¶ 10. The Center's Office of Safety and Security, along with the firms of JLL and ATSR, are

currently undergoing assessment of proposed emergency evacuation procedures that might enable continued public access while maintaining public safety. *See id.* ¶¶ 13–19.

Mr. Floca informed Center staff on September 30, 2026 that the temporary closure is ongoing and that a detailed emergency-egress assessment is forthcoming. *See id.* ¶¶ 11–12. As of that date, Mr. Floca indicated that he expected that assessment to be complete within one to two weeks after September 30. *See id.* ¶ 12. As of today, emergency physical remediation work to the overhead soffit panels has commenced. *See id.* ¶ 25.

Dated: October 2, 2026

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General, Civil Division

ERIC J. HAMILTON
Deputy Assistant Attorney General

BRANTLEY MAYERS
Counsel to the Assistant Attorney General

STEPHEN M. ELLIOTT
Assistant Branch Director

CHRISTOPHER M. LYNCH
Chief Litigation Counsel

/s/ William S. Jankowski
WILLIAM S. JANKOWSKI
D.C. Bar No. 90021524
Trial Attorney
U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, DC 20530
(202) 353-7578
william.s.jankowski@usdoj.gov

Counsel for Defendants

CERTIFICATE OF SERVICE

I, William S. Jankowski, hereby certify that on October 2, 2026, I electronically filed the foregoing, and all its attachments, using the Court's CM/ECF system, which automatically serves this document upon all counsel of record, in keeping with LCvR 5.4(d).

/s/ William S. Jankowski
William S. Jankowski

Counsel for Defendants