

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

_____)	
ELECTRONIC PRIVACY)	
INFORMATION CENTER,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 19-cv-810 (RBW)
)	
UNITED STATES DEPARTMENT OF)	
JUSTICE,)	
)	
Defendant.)	
_____)	
JASON LEOPOLD, BUZZFEED, INC.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 19-cv-957 (RBW)
)	
UNITED STATES DEPARTMENT OF)	
JUSTICE, et al.)	
)	
Defendants.)	
_____)	

**DEFENDANT’S NOTICE OF FILING UNSEALED SUBMISSION
OF CERTAIN RESPONSES TO COURT ORDER**

On July 21, 2020, undersigned counsel filed under seal its responses to the Court’s questions concerning certain redactions to the report prepared by Special Counsel Robert S. Mueller, III regarding his investigation into Russian interference in the 2016 United States presidential election (the “Report”). *See* Dkt. 125; *see also* Order, Dkt. 123. The Department’s responses to the Court’s questions consisted of two parts: (1) a spreadsheet that the Court provided to undersigned counsel, with Column G completed per the Court’s Order (“Exhibit A”); and (2) a sealed third declaration from Vanessa Brinkmann, Senior Counsel of the Department’s Office of

Information Policy, which provides additional detail for certain responses in Exhibit A. A redacted, public version of Ms. Brinkmann's third declaration was filed on the docket in July. *See* Dkt. 126-1.

As previously described in detail, *see* Dkt. 126, in July 2020, the Department conducted another comprehensive review of the redactions listed in Exhibit A and determined that certain information in the Report now could be released without harming government interests or pending matters. The Department previously requested leave of the Court to provide to Plaintiffs a version of Exhibit A that only shows the information for which the Department is withdrawing its withholdings. *See* Dkt. 126. Because the Court granted such leave at the *ex parte* hearing held on September 15, 2020, Defendant respectfully submits a redacted version of Exhibit A that only shows the information for which the Department is withdrawing its withholdings. Where the Department withdrew only one of several bases for a redaction, the Department continues to withhold the underlying information and that information was therefore redacted.

Dated: September 18, 2020

Respectfully submitted,

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2020, I electronically transmitted the foregoing to the parties and the clerk of court for the United States District Court for the District of Columbia using the CM/ECF filing system.

/s/ Courtney D. Enlow

_____ COURTNEY D. ENLOW

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