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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

IN RE SPRINGFIELD GRAND)
JURY INVESTIGATION) CASE NO. 15-MC-3005
) SPRINGFIELD, ILLINOIS
)

TRANSCRIPT OF PROCEEDINGS
BEFORE THE HONORABLE SUE MYERSCOUGH
UNITED STATES DISTRICT JUDGE

JULY 29, 2015

A P P E A R A N C E S:

FOR THE GOVERNMENT:

TIMOTHY BASS
PATRICK HANSEN
U.S. ATTORNEY'S OFFICE
318 S. SIXTH STREET
SPRINGFIELD, ILLINOIS

FOR MR. SCHOCK:

GEORGE J. TERWILLIGER, II
NICHOLAS LEWIS
CHRISTINA EGAN
MCGUIRE WOODS, LLP
2001 K. STREET NW
WASHINGTON, DC
AND
JEFFREY LANG
LANE & WATERMAN, LLP
220 N. MAIN STREET
DAVENPORT, IA

COURT REPORTER:

KATHY J. SULLIVAN, CSR, RPR, CRR
OFFICIAL COURT REPORTER
600 E. MONROE
SPRINGFIELD, ILLINOIS
(217)492-4810

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I N D E X

WITNESS D I R E C T C R O S S R E D I R E C T R E C R O S S

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P R O C E E D I N G S

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3 THE COURT: Good morning. Court is
4 reconvened. We have had a delay this morning and
5 the reason for the delay is what?

6 MR. BASS: Your Honor, I believe we have at
7 least a temporary resolution that would cause us to
8 request that we postpone this hearing and proceed no
9 further.

10 So if I could be heard on that, what I believe
11 is an agreement; subject to Mr. Terwilliger
12 concurring; then I would anticipate that we would
13 ask Your Honor to stay any further proceedings on
14 this pending that agreement.

15 THE COURT: Do we have any witnesses who
16 are here from out of town who need to give testimony
17 today rather than you postponing?

18 MR. BASS: There are witnesses here; at
19 least one that has been subpoenaed by both sides.
20 But if, in fact, we do have an agreement that Your
21 Honor would accept, that would, I believe, moot any
22 need for further evidence or further testimony from
23 those witnesses.

24 THE COURT: All right. So is that with
25 your agreement, Mr. Terwilliger?

1 MR. TERWILLIGER: Assuming that the
2 agreement that Mr. Bass is about to talk about,
3 we -- we agree on the record here; yes. I think
4 it's more efficient and a better solution to stop
5 taking the testimony at this point.

6 And as Mr. Bass suggests, I think we both agree
7 that sort of suspending the hearing for the moment
8 pending the execution of this agreement as to part
9 of this dispute would be a good idea.

10 THE COURT: Well, let me go ahead then,
11 Ms. Haney is in the back with Mr. Coffield; you're
12 excused at this time.

13 MR. TERWILLIGER: Your Honor, I'm sorry.

14 THE COURT: I'm sorry.

15 MR. TERWILLIGER: Maybe we should wait to
16 make sure we have an agreement here before we excuse
17 her.

18 THE COURT: All right.

19 MR. TERWILLIGER: Thank you, Your Honor.

20 THE COURT: Mr. Bass.

21 MR. BASS: Your Honor, so the record is
22 clear, if you have Your Honor's order on page 29,
23 your June 25th order.

24 THE COURT: I've got it.

25 MR. BASS: You ordered that this hearing be

1 held with respect to now campaign entity records;
2 given your ruling yesterday morning; that he
3 possesses, controls or holds in a representative
4 capacity.

5 As you know, we -- the Government issued and
6 executed a search warrant on the campaign office in
7 Peoria. We have said and we are not -- that we are
8 not seeking a re-production of the records from
9 within the Peoria office. Just so it's clear, from
10 within the Peoria office.

11 There are also campaign entity records that
12 were subpoenaed from Mr. Kilgore's firm in Athens,
13 Georgia, which is Professional Data Services. That
14 was the same -- the same records were subpoenaed
15 from that -- were separately subpoenaed from that
16 entity.

17 And that -- as of -- that subpoena was issued
18 in April for a May compliance date. There was an
19 initial production of -- a partial production of
20 those records in -- by June. There was -- it was --
21 it was identified through -- through Grand Jury
22 information that there was not a complete production
23 by PDS; for short; through Mr. Bopp, the attorney
24 for Professional Data Services, and Mr. Kilgore.
25 And there was a representation to the Government

1 that the remainder of the responsive records would
2 be produced.

3 As of today, they have not been fully produced;
4 although yesterday morning we received a -- by Fed
5 Ex we received a hard drive of what have been told
6 to us are responsive records. And we've been
7 further advised by Mr. Bopp that the remaining
8 records will be produced by next week.

9 So the point being, Your Honor, that there are
10 responsive campaign entity records in the possession
11 of PDS which the Government is obtaining from PDS.
12 And we anticipate that by next week, subject to
13 confirmation, that they will have been produced with
14 a privilege log of any records that were withheld.

15 That -- that leaves any campaign entity-related
16 records; and when I say campaign entity-related
17 records, I'm talking about the information that is
18 sought in the subpoena to Mr. Schock personally and
19 in the separate subpoenas to his congressional
20 offices, Paragraphs 1, 2, and 3.

21 That leaves all such information, campaign
22 related, that is set forth in Paragraphs 1, 2, and 3
23 of the original subpoenas that are in Mr. Schock's
24 personal possession. Other than the records that
25 are in the possession of his counsel that were

1 previously copied.

2 So with respect to the records that are
3 remaining -- the records that are -- that were in
4 Mr. Schock's personal possession, and for which the
5 parties have now entered into a direct use immunity
6 agreement, as evidenced by Government Exhibit B
7 yesterday, for production -- direct use immunity
8 agreement for production of those records; and the
9 nature of the immunity is spelled out in the
10 agreement; there has begun a production of those
11 records as evidenced by that exhibit and
12 Mr. Coleman's testimony.

13 So given that, I believe we have an agreement
14 that within 30 days of today's date all other
15 responsive records in Mr. Schock's possession will
16 be produced.

17 And given -- and assuming that Mr. Terwilliger
18 concurs that that is the agreement, we'd ask that
19 you suspend this hearing until such time that the
20 parties can further represent to the Court that the
21 proceeding is moot or that we ask you for -- to
22 further convene.

23 THE COURT: Mr. Terwilliger, is that your
24 agreement?

25 MR. TERWILLIGER: Thank you, Your Honor.

1 First of all, thank you for indulging us this
2 morning to talk for a few minutes. This just came
3 up this morning when we got to court, so we
4 appreciate the time.

5 I think it is, but I'm going to address just a
6 couple of points for clarity and then make a
7 suggestion that maybe it would be best to reduce
8 this understanding to something in writing and
9 submit it to the Court. But I think in principle we
10 have -- we have agreement.

11 The one thing that Mr. Bass said that I
12 think; not I think, I know; either he didn't intend
13 to sound exactly like it sounded or maybe we're not
14 on the same page.

15 And if I may, Your Honor, let me just go back
16 one step. I think part of the confusion here has
17 been about the use of the term, for our shorthand in
18 these proceedings, of campaign records.

19 If you consider the -- the campaign entities
20 that were in question, they as entities hold a body
21 of records. We've not contested that those are not
22 collected entities, as Your Honor mentioned
23 yesterday.

24 Those original records are the records of those
25 organizations. When those organizations got a

1 subpoena, what we did, or caused to happen, was for
2 the person we believe and have maintained in this
3 litigation is the lawful custodian of those records,
4 to cause them to be copied and produced to the
5 Government.

6 In the course of that entity's business, those
7 entities' business over a period of time, copies of
8 those records may be distributed in various places.
9 Mr. Bass just made reference that copies would be
10 distributed to PBS, Mr. Kilgore's organization that
11 deals with FEC compliance. Copies may have gone to
12 Mr. Schock, because obviously those campaigns and
13 his political activities go hand-in-hand.

14 So some of the records that Mr. Coleman
15 described yesterday that he saw in material that
16 Mr. Schock has already produced could well have come
17 from the campaign, be sent to the campaign, refer to
18 the campaign, and so forth.

19 What we are -- we've already agreed to do and
20 now we're putting a timeline on it; which is fine
21 with us; is to produced those records that are
22 described in the subpoena to Mr. Schock that was
23 served on Mr. Schock. And if some of those relate
24 to or emanated from or were sent to, by e-mail for
25 example, the campaign, of course they're covered

1 because they're within the four corners of the
2 subpoena description.

3 What we're not agreeing to do; and I don't
4 think the Government is asking us to agree to that;
5 is to produce any of the campaign entities' records
6 in Mr. Schock's representational capacity. Because
7 as Your Honor knows, we have, all along, contested
8 that he is -- functions in a representational
9 capacity. And instead, we have maintained and were
10 prepared to put on testimony to support this notion
11 that the treasurer is the only, the sole, lawful
12 custodian for those records.

13 But that being said, we of course recognize
14 that if there's something that relates to the
15 campaign that's within the description of the
16 subpoena, we have an obligation to produce that.

17 Just a couple finally notes for the sake of
18 clarity here.

19 The personal -- enforcement of the personal
20 subpoena has not been part of these contempt
21 proceedings pursuant to 28 U.S.C. 1826, because we
22 had reached agreement on that and have been in the
23 process of producing records.

24 So the only thing that's been in dispute is
25 about his obligation to produce campaign records.

1 And what I hear Mr. Bass and the Government
2 reasonably saying is, you only have to produce such
3 campaign records as are in your personal possession.
4 They will be covered, as Mr. Bass indicated, by the
5 act of immunity letter. And I think we just need to
6 clarify that we don't have to produce them on
7 account of any representational -- on account of any
8 responsibility he has in a representational capacity
9 for those organizations.

10 If that's the case, then we certainly do have
11 an agreement.

12 MR. BASS: Your Honor, could we just have
13 a -- so that we don't include you in these
14 negotiations, could we have just a couple minutes to
15 confer?

16 THE COURT: You may. Court is in recess.

17 MR. TERWILLIGER: Thank you, Your Honor.

18 (A recess was taken.)

19 THE COURT: Court is reconvened. Have we
20 hammered out the details, Mr. Bass?

21 MR. BASS: Your Honor, I think we have, but
22 given the importance of -- I think we both agree
23 that the prudent thing to do would be to reduce our
24 agreement to writing and to file it of record with
25 the Court.

1 So we would like 'til tomorrow, close of
2 business tomorrow, to reduce our agreement to
3 writing and to advise Your Honor of that agreement.
4 And I have every reason to believe that we will be
5 able to reduce the agreement to writing and to be in
6 a position to ask Your Honor to stay these
7 proceedings for 30 days.

8 In other words, we have an -- I believe we have
9 an agreement as to production of responsive records
10 within 30 days; staying these proceedings. And then
11 we would report back to Your Honor in 30 days as to
12 whether or not further proceedings on this issue are
13 necessary or are unnecessary.

14 So I believe what we're requesting, Your Honor,
15 is if we could adjourn this matter for today,
16 subject to providing to the Court an agreement in
17 writing by close of business tomorrow. And that we
18 would report to Your Honor in 30 days whether
19 further proceedings are necessary or not.

20 THE COURT: All right. So I will expect an
21 agreed order by June 30th at 5:00, that's Thursday.
22 July, I'm sorry; I lost a month in there, didn't I.
23 And let's just schedule a video conference for
24 30 days from today just so you can report to me.

25 MR. TERWILLIGER: That's fine, Your Honor.

1 THE COURT: Okay. Diane.

2 MR. TERWILLIGER: I love Springfield, Your
3 Honor. If you want to have it in person, that would
4 be fine.

5 MR. BASS: And, Your Honor, just so it's
6 clear, we would not be asking for an order from Your
7 Honor, other -- just that we would file the
8 agreement. And the only, I guess, order actually
9 we'd ask the Court to take would be to stay these
10 proceedings for 30 days.

11 THE COURT: All right.

12 MR. TERWILLIGER: And just for clarity,
13 Your Honor, I think -- and so the Court can
14 understand fully where we are. What we're basically
15 agreeing to is a standstill in the disputed matters
16 except for the collective entity issue, which the
17 Government intends to further pursue.

18 But as to the other matters, we're agreeing to
19 a standstill of the current issues under Your
20 Honor's show cause order. And we're producing --
21 agreeing to produce -- continue producing pursuant
22 to the subpoena that was served on Mr. Schock in his
23 personal capacity and pursuant to the terms of that
24 subpoena. What we've now added to our agreement on
25 that is to finish that production within 30 days

1 from today. Correct?

2 MR. BASS: Yes, Your Honor.

3 THE COURT: All right. Diane, what date?

4 MR. BASS: Your Honor, before you set a
5 date there's another issue I wanted to raise that
6 may relate to setting a date.

7 THE COURT: Mr. Bass.

8 MR. BASS: Your Honor, as to the
9 separate -- anything further? George, anything
10 further we need to address on that issue?

11 MR. TERWILLIGER: No. Thank you. Other
12 than the date.

13 MR. BASS: Before scheduling a date on
14 that, Your Honor, just -- I guess as an alert to the
15 Court and a request.

16 Assuming Your Honor does not reconsider her
17 ruling yesterday; and does Your Honor intend to
18 enter any order relating to that ruling that we
19 would need to file a brief on within seven days?

20 THE COURT: I will do a scheduling text
21 order, but it will not enter -- I will not enter a
22 finding. I'll have the issue addressed after you
23 file your brief and then Mr. Terwilliger files his.

24 MR. BASS: So we would be asking Your Honor
25 to reconsider her oral pronouncement yesterday?

1 THE COURT: Hm-mm.

2 MR. BASS: So assuming, Your Honor, that --
3 and we will do that within seven days.

4 In the meantime, we intend to issue a subpoena
5 to the House of Representatives for the identical
6 records that are in -- that were sought in the
7 original three subpoenas.

8 And we will do that I expect very shortly, if
9 not by the end of the day. With a compliance date
10 for the September Grand Jury. That is in excess of
11 30 days from today.

12 As Your Honor knows, since it's the identical
13 records that Mr. Schock has invoked speech or debate
14 privilege concerning, as I mentioned yesterday, we
15 anticipate we will have further issues relating to
16 that by substituting the House of Representative for
17 Mr. Schock as to the obligation to produce.

18 In other words, based on the Government's
19 conversations with House counsel, what we anticipate
20 will happen, what we've been told what will happen,
21 is that the House counsel will provide these records
22 to counsel for Mr. Schock; which they've already
23 done completely as to paper records and partially,
24 as we understand it, as to electronic records.

25 The subpoena that we would issue to the House

1 would compel the House to comply directly to the
2 Grand Jury with those records; which again,
3 Mr. Schock would have -- has invoked speech and
4 debate privilege as to and has indicated to Your
5 Honor that he wishes to conduct a speech and debate
6 privilege review.

7 Anticipating that the Government may need to
8 file a motion to compel compliance with that
9 subpoena by the compliance date and a request that
10 Your Honor -- I guess I would -- I guess at this
11 point, since we haven't issued the subpoena, it's
12 probably appropriate for me -- for the Government
13 just to wait until after we issue that subpoena to
14 make any further request for Your Honor.

15 But I would anticipate that once we issue that
16 subpoena and any motion to compel, that we ask Your
17 Honor to set a drop-dead deadline for any privilege
18 review and a direction that compliance with that
19 subpoena will be made by the compliance date, which
20 I anticipate will be September.

21 So having said all that, Your Honor, this
22 relates to scheduling. I would anticipate that we
23 would be asking Your Honor for a hearing date with
24 respect to that issue, as well as this issue
25 relating to that which we've reached an agreement

1 on.

2 So I'm not asking the Court to do anything, I'm
3 just alerting Your Honor to the fact that we will --
4 I anticipate that we will have further -- need for
5 further proceedings as to the Congressional records
6 and the privilege assertion that has been asserted
7 in this proceeding. And would ask -- be asking for
8 a hearing before Your Honor either at the time of or
9 immediately after the -- no later than at that time
10 of or immediately after the Grand Jury session in
11 September.

12 So with that, Your Honor, what would be your --
13 what would Your Honor's thinking about scheduling
14 for this matter within 30 days?

15 THE COURT: Well, the status will be
16 scheduled for August 28th, that's a Friday, at 3:30.
17 Is that -- that would be 4:30 your time; right?

18 MR. TERWILLIGER: Yes, Your Honor, that's
19 fine. Thank you.

20 MR. BASS: And, Your Honor, you said 3:30?

21 THE COURT: Yes.

22 MR. BASS: If we -- what is Your Honor's
23 schedule that -- the following day? Did you say
24 that was a Thursday?

25 THE COURT: That's a Friday.

1 MR. BASS: A Friday. What would be Your
2 Honor's schedule the following week?

3 THE COURT: Terrible. We looked at it.
4 Let me look again.

5 How about Friday, September 4th?

6 MR. BASS: We don't have to set that now,
7 Your Honor, out of courtesy to Mr. Kircher, assuming
8 he would obviously then be a party, the House would
9 be a party to any proceeding. I just wanted to --

10 MR. TERWILLIGER: I'm confused. Which date
11 are we talking about now? I thought Your Honor was
12 talking about --

13 MR. BASS: She's talking about August
14 28th --

15 MR. TERWILLIGER: I thought you were
16 talking about the status hearing date in this
17 matter.

18 THE COURT: That's what I'm talking about.

19 MR. BASS: That's fine.

20 THE COURT: All right. So the August 28th
21 3:30 is fine?

22 MR. BASS: Fine, Your Honor.

23 THE COURT: All right. So if you do need
24 some court time after that, August 28th, we'll
25 address it on August 28th, unless you ask for a

1 hearing before that.

2 MR. BASS: Thank you, Judge.

3 THE COURT: And I'm sure Mr. Terwilliger
4 knows that compliance is important and I'm sure
5 he'll be working to assert the privileges promptly.

6 MR. TERWILLIGER: Your Honor, may I address
7 that for a moment?

8 THE COURT: Hm-mm.

9 MR. TERWILLIGER: Obviously, we can't speak
10 for the House and whatever position they might take
11 on compliance and that sort of thing. You know,
12 it's not gonna be our job to do their job.

13 But on the speech and debate issue, I just
14 would make one observation and one representation,
15 if I may.

16 The observation is, as I said to Mr. Bass and
17 Mr. Hansen earlier, there's two ways to go about
18 that, one way which will be pretty efficient and one
19 way which would not.

20 The efficient way is to review those records
21 that are identified by the House as responsive for
22 speech and debate privilege because that will be a
23 smaller universe than all of the documents. The
24 inefficient way to go about it would be to review
25 everything for speech and debate and then identify

1 the responsive documents.

2 So I'm just representing that what we will
3 suggest to the House, assuming they ask for our help
4 on the speech and debate part, is that we try, as a
5 responsive record is identified, try to identify
6 whether or not that may be a speech or debate
7 covered document at the same time. So that we're
8 not looking at the entire universe of all documents
9 for speech and debate.

10 THE COURT: So what you're saying is you
11 can't start your review right now because the House
12 has produced everything to you?

13 MR. TERWILLIGER: Because the House has not
14 produced everything to us. And I -- I'm gonna have
15 to work out with Mr. Kircher -- we don't have
16 everything from the House yet. We -- we only have
17 the EIS from the Washington Capitol Hill office. We
18 don't have the EIS from the district offices.

19 But I'm gonna have to work out with Mr. Kircher
20 something about compliance with the subpoena. We're
21 not gonna take responsibility, obviously, for his
22 compliance with the subpoena. Whether and to what
23 extent we are in a position to render him assistance
24 in that regard, we will certainly look at that and
25 discuss it with him in good faith.

1 THE COURT: So you're telling me that
2 you're going to expect Mr. Kircher to do a review to
3 decide what's produceable in response to the
4 subpoena and then you'll look at what he has decided
5 is produceable?

6 MR. TERWILLIGER: Not necessarily, Your
7 Honor.

8 First of all, I think Mr. -- Mr. Kircher in the
9 first instance, as with the paper records, already
10 made a cut and -- in response to the preservation
11 order that he -- or preservation directive or
12 request he received from the Government as to what's
13 responsive. I'm assuming; but I don't know because
14 I haven't talked to him about it; that he would do
15 the same thing with the electronic records.

16 What I'm saying to the Court is we will try to
17 work with him in that process, at least insofar as
18 the speech and debate issue is concerned, to at the
19 same time identify anything that would be subject to
20 speech or debate.

21 A long time ago Mr. Kircher offered to assist
22 us on the speech or debate provision as well, since
23 they had residual expertise. And I'm sure he
24 will -- I feel certain he will do that again and
25 offer us.

1 But I will say one line we have to draw is we
2 can't be responsible for identifying what's
3 responsive to a subpoena that's been issued to the
4 House. At the end of the day, that's gonna have to
5 be their responsibility, because that's what the law
6 is.

7 THE COURT: All right.

8 MR. TERWILLIGER: Your Honor, there was one
9 other issue, housekeeping matter I'd like to take
10 up. But it might be appropriate if counsel could --

11 MR. HANSEN: Before we get there, can I
12 address what Mr. Terwilliger -- I just want to make
13 sure what he just said.

14 Understanding the Court's ruling yesterday,
15 there is still a subpoena to Aaron Schock for the
16 records of the 18th Congressional District. Nothing
17 has changed there. They have asserted a privilege.
18 If that privilege is changed, reversed, whatever, if
19 there is no privilege, he still has that obligation
20 to produce them.

21 So we're not relieving Mr. Schock of his
22 obligation by also duplicating that by issuing a
23 subpoena to the House of Representatives. I just
24 want to make sure that's clear, because I thought I
25 heard something different. And --

1 THE COURT: I don't think that's what
2 Mr. Terwilliger said.

3 MR. TERWILLIGER: Thank you, Your Honor. I
4 don't think it is either.

5 THE COURT: I thought you made it clear, in
6 fact, that the issue still exists --

7 MR. TERWILLIGER: Exactly.

8 MR. BASS: And all I was suggesting, Your
9 Honor, is that there will be -- although there -- as
10 Mr. Terwilliger said, there is not an obligation on
11 Mr. Schock to determine what's responsive, there is
12 an obligation to -- to assert a timely privilege.
13 And in that way there is an obligation for response
14 to the subpoena as to that -- as to that point to
15 the extent that it impacts compliance with the
16 subpoena.

17 So in other words, as I indicated yesterday,
18 the House of Representatives and Mr. Schock will be
19 joined in this litigation. And what I was
20 suggesting to Your Honor is I anticipate that we
21 will -- again, I don't want to speak for Mr. Kircher
22 at all. We certainly will try to resolve any issues
23 with him. But I would anticipate that there will be
24 further litigation before Your Honor within 30 days.

25 You had a housekeeping --

1 THE COURT: I thought Mr. Terwilliger just
2 assured us he's going to promptly work with
3 Mr. Kircher to assert the privilege. And I'm sure
4 he will. And there may well be further issues we
5 have to address down the road.

6 But Mr. Terwilliger, what's your other issue?

7 MR. TERWILLIGER: May we approach the bench
8 on this, Your Honor?

9 THE COURT: Yes, you may.

10 MR. COFFIELD: Your Honor, may we be
11 excused?

12 MR. TERWILLIGER: Yes.

13 MR. BASS: Yes.

14 THE COURT: All right. Thank you,
15 Mr. Coffield. Ms. Haney.

16 (The following sidebar discussion was held at
17 the bench, out of the hearing of the jury.)

18 (A sidebar discussion was held off the record
19 at the bench.)

20 MR. TERWILLIGER: It's just to what extent,
21 now that the hearing is open, does the Court --
22 should the Court open the record?

23 And I just wanted to make a -- raise that issue
24 and make a suggestion as to how much of the -- of
25 the written record should be open at this point.

1 THE COURT: How much?

2 MR. BASS: We ought to be on the record.

3 THE COURT: She's on the record.

4 MR. TERWILLIGER: Because I just thought if
5 we're gonna discuss things that are under seal, we
6 shouldn't do it in open court, that's all; that we
7 should do it at bench.

8 My suggestion, very simply, would be from the
9 motion for the order to show cause forward be
10 unsealed and everything prior to that remain sealed.

11 But I'm open to other suggestions.

12 MR. BASS: Well, that's contrary to what
13 was said yesterday, Your Honor. And since the
14 pleadings and the -- I know the Government's
15 exhibits, the Government's brief, referred to
16 exhibits that were filed under seal previously.

17 So...

18 MR. TERWILLIGER: That's true.

19 MR. BASS: So I'm going to suggest --

20 THE COURT: Why don't we just unseal the
21 hearing yesterday and today?

22 MR. TERWILLIGER: That's fine for now and
23 if somebody --

24 MR. BASS: I'm fine with the -- with the
25 pleadings that were filed for purposes of --

1 Your Honor, subject to just confirming that --
2 I don't believe there was any Grand Jury information
3 disclosed specifically in any of the pleadings
4 post -- from the motion for an order to show cause
5 going forward. But subject just to confirming that;
6 and I was gonna suggest that to Your Honor in any
7 event; that the Government be given an opportunity
8 to advise Your Honor as to any redactions.

9 But subject to confirming that there's no Grand
10 Jury information revealed in the pleadings from the
11 motion for order to show cause forward, we have no
12 objection to unsealing that.

13 THE COURT: By when?

14 MR. BASS: I think I could do that by close
15 of business Friday.

16 THE COURT: Friday, 5:00 p.m. Okay. Is
17 that acceptable?

18 MR. TERWILLIGER: Sure. Yes, Your Honor.

19 MR. BASS: So we're only -- there's
20 obviously no Grand Jury information in your
21 pleadings. So just talking about any Grand Jury
22 information in the Government's pleadings --

23 MR. TERWILLIGER: Right.

24 MR. BASS: -- and the record, in terms of
25 the hearing record, is obviously unsealed.

1 THE COURT: So that would be my orders
2 also.

3 MR. TERWILLIGER: Thank you, Your Honor.

4 THE COURT: Thank you, Mr. Terwilliger.

5 (The following proceedings were held in open
6 court.)

7 THE COURT: All right then, this matter is
8 continued. We will reconvene on the 28th at 3:30 by
9 video conference. Court is adjourned.

10 (Court was adjourned in this matter.)

11

12 I, KATHY J. SULLIVAN, CSR, RPR, CRR, Official Court
13 Reporter, certify that the foregoing is a correct
14 transcript from the record of proceedings in the
15 above-entitled matter.

16

17

18

19

20 This transcripts contains the
21 digital signature of:

22

23 Kathy J. Sullivan, CSR, RPR, CRR

24

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