

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

IN RE EMERGENCY REQUEST TO
UNSEAL SPECIAL MASTER'S REPORT
CONCERNING ALLEGATIONS OF
IMPROPER DISCLOSURES OF GRAND
JURY MATERIALS

Misc. No. 18-112 (RCL)

Judge Royce C. Lamberth

REQUEST FOR EXPEDITED SCHEDULE AND STATUS CONFERENCE

Petitioner American Oversight respectfully requests that the Court set an expedited schedule and hold a status conference in the above-captioned case:

1. On August 14, 2018, American Oversight filed an Emergency Request to Unseal Special Master's Report Concerning Allegations of Improper Disclosures of Grand Jury Materials by Independent Counsel in Connection with 1998 Investigation of President Clinton (Dkt. 1);

2. As described therein, American Oversight seeks resolution of its request on an emergency basis, as the Special Master's Report potentially contains information relevant to the Senate confirmation hearings for the Honorable Brett D. Kavanaugh's nomination to the Supreme Court of the United States, which are scheduled to begin two weeks from today on September 4, 2018;

3. Last Thursday, August 16, 2018, Elizabeth J. Shapiro, the Deputy Director of the Department of Justice Federal Programs Branch, informed undersigned counsel Andrew D. Freeman that the National Archives and Records Administration had found a copy of the Special Master's Report;

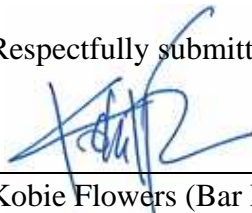
4. Our understanding from conversations with Ms. Shapiro is that the DOJ has possessed a copy of the Special Master's Report since at least the early evening on Thursday,

August 16, 2018; that the Report is relatively short in length; and that as of the end of last week the DOJ had begun its review of the Report.

5. Given the emergency nature of this matter, we request that the Court set an expedited schedule for the resolution of the request to unseal. As an initial matter, we request that the Court order the DOJ to (1) provide a copy of the Special Master's Report to your Honor and (2) file a document outlining its position on the unsealing of the Special Master's Report by the end of the day on Wednesday, August 22, 2018;

6. We further request that, at its earliest convenience, the Court hold a status conference, whether telephonically or in person, to discuss scheduling and any other issues concerning the resolution of the Emergency Request to Unseal. Counsel for American Oversight is available to participate in a status conference any time this week, August 21-24, other than after 4:30 on Thursday.

Respectfully submitted,



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