

IN THE SUPERIOR COURT  
FOR THE DISTRICT OF COLUMBIA

CIVIL DIVISION

WP COMPANY LLC  
d/b/a THE WASHINGTON POST,  
1301 K Street, NW  
Washington, D.C. 20071

**Plaintiff,**

v.

Case No. **2021 CA 002114 B**

THE DISTRICT OF COLUMBIA,  
John Wilson Building  
1350 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

Serve:

Mayor Muriel Bowser  
1350 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

and

Office of the Attorney  
General  
for the District of Columbia  
441 4th Street NW  
Washington, D.C. 20001

**Defendant.**

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

Plaintiff WP Company LLC d/b/a The Washington Post (the “Post”), by its undersigned counsel, alleges for its Complaint:

1. This is an action under the District of Columbia Freedom of Information Act, D.C. Code § 2-531 *et seq.* (“FOIA”), to compel the production of public records concerning the District’s preparations for and responses to the riot at the United States Capitol on January 6,

2021. The Executive Office of the Mayor (the “EOM”), the District of Columbia Metropolitan Police Department (the “MPD”), the Office of Unified Communications (the “OUC”), and the Office of the Chief Medical Examiner (the “OCME”) have improperly withheld these records, which are responsive to six FOIA requests that the Post has made since January 2021.

2. The Post has widely reported on the failures of gathering and disseminating intelligence between federal civilian agencies, the Capitol Police Department, the Pentagon, and the National Guard leading up to and during the attacks on the Capitol. These requested records will shed further light on how the District’s agencies prepared for and performed their duties.

3. Despite the national importance of the requested records, the District has repeatedly either ignored requests for these records or cited inapplicable exemptions in withholding them, against the spirit and text of FOIA.

4. The records at issue in this action concern issues of the highest public importance. Access to these records would permit the public to evaluate how the Mayor’s Office and the MPD acted (and reacted) when the Capitol Police called in the MPD for support on January 6. The requested records are also important to the public’s oversight of the investigation into whether the rioters’ chemical attack led to the death of Capitol Police Officer Brian D. Sicknick.

5. Despite the compelling public interest in all of the records, the EOM and the MPD both denied the Post’s FOIA requests, either expressly or constructively.

6. These denials are contrary to the legal requirements of FOIA and to the purpose of the statute. FOIA advances the District’s commitment to a transparent, participatory, and democratic form of government. Access to information about the District’s preparations for and responses to a violent attack on the federal government are at the very heart of the democratic accountability that FOIA is designed to serve.

## **JURISDICTION AND VENUE**

7. This Court has jurisdiction over this action with respect pursuant to D.C. Code § 2-532(e), which provides that “[a]ny failure on the part of a public body to comply with a request . . . within the time provisions . . . of this section shall be deemed a denial of the request, and the person making such request shall be deemed to have exhausted his administrative remedies with respect to such request,” and D.C. Code § 2-537 (a)(1), which provides that “if a person is deemed to have exhausted his or her administrative remedies pursuant to subsection (e) of § 2-532, the person seeking disclosure may institute proceedings for injunctive or declaratory relief in the Superior Court for the District of Columbia.”

8. This Court additionally has jurisdiction over this action pursuant to D.C. Code Mun. Regs. tit. 1 § 412.1, which provides that “[w]hen a request for records has been denied in whole or in part by an agency, the request . . . may seek immediate judicial review of the denial in the D.C. Superior Court.”

9. Venue properly lies with this Court as the defendant is the District of Columbia, the actions forming the basis of the claim occurred principally within the District of Columbia and the agency records at issue are located in the District of Columbia.

## **PARTIES**

10. The Post is a news organization based in Washington, D.C. It publishes the leading daily newspaper, by print circulation, in the nation’s capital, as well as the website washingtonpost.com, which reaches more than 82.5 million unique visitors per month, according to independent auditor comScore. The Post has won 69 Pulitzer Prizes.

11. Because the Metropolitan Police Department is an agency within the District of Columbia government, the District of Columbia is the proper defendant in this FOIA action. The

OUC is a subgroup within the Metropolitan Police Department.<sup>1</sup> Similarly, the OCME is a subordinate agency of the Metropolitan Police Department.<sup>2</sup> Throughout this Complaint, “the MPD” shall reference the District of Columbia acting through its Metropolitan Police Department including the OUC and the OCME.

12. The Executive Office of the Mayor is also a public body within the District of Columbia government. Throughout this Complaint, “the EOM” shall reference the District of Columbia acting through its Executive Office of the Mayor and Mayor Muriel E. Bowser herself.

### **STATEMENT OF FACTS**

#### **The Capitol Riot**

13. As the entire world now knows, on January 6, 2021, thousands of rioters breached the United States Capitol in an attempt to halt the Electoral College vote count by Congress and then-Vice President Pence, leading to hundreds of arrests and several deaths, including one member of the Capitol Police Department, Officer Brian Sicknick.

14. As United States Attorney General Merrick Garland has said in reference to the Capitol insurrection, “I have not seen a more dangerous threat to democracy than the invasion of the Capitol.”<sup>3</sup>

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<sup>1</sup> *Gov’t of the District of Columbia Org. Chart*, Exec. Office of the Mayor (Jan. 15, 2019), <https://mayor.dc.gov/sites/default/files/dc/sites/mayormb/publication/attachments/DCGovtOrgChart2019.pdf>.

<sup>2</sup> *Id.*

<sup>3</sup> Devlin Barrett, Abigail Hauslohner, Spencer S. Hsu, & Ashlyn Still, *A Sprawling Investigation: What We Know So Far About the Capitol Riot Suspects*, The Washington Post (May 13, 2021), [https://www.washingtonpost.com/nation/interactive/2021/capitol-riot-arrests-investigation/?hpid=hp\\_complete-coverage-pro-trump-mob-storms-capitol-building\\_3](https://www.washingtonpost.com/nation/interactive/2021/capitol-riot-arrests-investigation/?hpid=hp_complete-coverage-pro-trump-mob-storms-capitol-building_3).

15. Capitol Police called upon the MPD and the National Guard for support to protect the Capitol building during this dangerous threat, but they were unprepared for and easily overpowered by the force of the attacks.

16. A Capitol Police intelligence report warned about this possibility three days before the attack,<sup>4</sup> and the Federal Bureau of Investigation likewise warned the MPD and Capitol Police of the threat of the attack less than twenty-four hours in advance.<sup>5</sup>

17. Leading up to January 6, 2021, the Pentagon restricted the D.C. National Guard's authority, requiring a rigorous process to receive formal approval from high-level officials who were concerned about the "visual of the National Guard standing a police line with the Capitol in the background."<sup>6</sup>

18. The Post has reported on "significant, widespread, and unacceptable breakdowns in intelligence gathering" during the preparations for and on the day of January 6, 2021, including "omissions and miscommunications" between federal agencies, the Capitol Police, the

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<sup>4</sup> Carol D. Leonning, *Capitol Police Intelligence Report Warned Three Days Before Attack that 'Congress Itself' Could be Targeted*, The Washington Post (Jan. 15, 2021), [https://www.washingtonpost.com/politics/capitol-police-intelligence-warning/2021/01/15/e8b50744-5742-11eb-a08b-f1381ef3d207\\_story.html](https://www.washingtonpost.com/politics/capitol-police-intelligence-warning/2021/01/15/e8b50744-5742-11eb-a08b-f1381ef3d207_story.html).

<sup>5</sup> Beth Reinhard & Matt Zapposky, *FBI Alert About Possible 'War' Against Congress Reached D.C. and Capitol Police on Eve of Attack, Deepening Security Questions*, The Washington Post (Feb. 23, 2021), [https://www.washingtonpost.com/politics/capitol-riot-intelligence/2021/02/23/1cdfd126-75f4-11eb-ae66-8b9e3c6918a1\\_story.html](https://www.washingtonpost.com/politics/capitol-riot-intelligence/2021/02/23/1cdfd126-75f4-11eb-ae66-8b9e3c6918a1_story.html).

<sup>6</sup> Paul Sonne, *Pentagon Restricted Commander of D.C. Guard Ahead of Capitol Riot*, The Washington Post (Jan. 26, 2021), [https://www.washingtonpost.com/national-security/dc-guard-capitol-riots-william-walker-pentagon/2021/01/26/98879f44-5f69-11eb-ac8f-4ae05557196e\\_story.html](https://www.washingtonpost.com/national-security/dc-guard-capitol-riots-william-walker-pentagon/2021/01/26/98879f44-5f69-11eb-ac8f-4ae05557196e_story.html) (quoting then-Capitol Police Chief Steven Sund's recollection of Army Staff director Lt. Gen. Walter Piatt's statement).

National Guard, and the MPD, which contributed to the “security failures” and violence of the riot.<sup>7</sup>

19. The Post extensively reported on the Capitol insurrection – as it was happening and in the weeks and months since.<sup>8</sup> The FOIA requests at issue in this action will shed light on important first-hand information before and during the Capitol riot and its deadly aftermath.

### **The Death of Capitol Police Officer Sicknick**

20. As the Post has reported, Capitol Police Officer Brian Sicknick “was among scores of officers hurt when rioters supporting the false election fraud claims of President Donald

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<sup>7</sup> Karoun Demirjian, *Capitol Police Had Intelligence Indicating an Armed Invasion Weeks Before Jan. 6 Riot, Senate Probe Finds*, The Washington Post (June 8, 2021), [https://www.washingtonpost.com/national-security/january-6-senate-investigation/2021/06/08/a8cc5b1e-c7d4-11eb-81b1-34796c7393af\\_story.html](https://www.washingtonpost.com/national-security/january-6-senate-investigation/2021/06/08/a8cc5b1e-c7d4-11eb-81b1-34796c7393af_story.html).

<sup>8</sup> See e.g., Aaron Blake, *What Trump Said Before His Supporters Stormed the Capitol, Annotated*, The Washington Post (Jan. 11, 2021), <https://www.washingtonpost.com/politics/interactive/2021/annotated-trump-speech-jan-6-capitol/> (analyzing then-President Trump’s speech); Aaron Blake, *The Big Holes in the First Big Jan. 6 Reports*, The Washington Post (June 8, 2021), <https://www.washingtonpost.com/politics/2021/06/08/very-conspicuous-holes-first-big-jan-6-report/> (analyzing holes in Senate Rules and Administration, Homeland Security, and Government Affairs committee bipartisan report); Beth Reinhard & Matt Zapposky, *FBI Alert About Possible ‘War’ Against Congress Reached D.C. and Capitol Police on Eve of Attack, Deepening Security Questions*, The Washington Post (Feb. 23, 2021), [https://www.washingtonpost.com/politics/capitol-riot-intelligence/2021/02/23/1cdfd126-75f4-11eb-ac66-8b9e3c6918a1\\_story.html](https://www.washingtonpost.com/politics/capitol-riot-intelligence/2021/02/23/1cdfd126-75f4-11eb-ac66-8b9e3c6918a1_story.html) (reporting FBI warning before Capitol insurrection); Paul Sonne, *Pentagon Restricted Commander of D.C. Guard Ahead of Capitol Riot*, The Washington Post (Jan. 26, 2021), [https://www.washingtonpost.com/national-security/dc-guard-capitol-riots-william-walker-pentagon/2021/01/26/98879f44-5f69-11eb-ac8f-4ae05557196e\\_story.html](https://www.washingtonpost.com/national-security/dc-guard-capitol-riots-william-walker-pentagon/2021/01/26/98879f44-5f69-11eb-ac8f-4ae05557196e_story.html) (reporting Pentagon restricted National Guard before Capitol riot); Devlin Barrett, Abigail Hauslohner, Spencer S. Hsu, & Ashlyn Still, *A Sprawling Investigation: What We Know So Far About the Capitol Riot Suspects*, The Washington Post (May 13, 2021), [https://www.washingtonpost.com/nation/interactive/2021/capitol-riot-arrests-investigation/?iid=lb\\_complete-coverage-pro-trump-mob-storms-capitol-building\\_3](https://www.washingtonpost.com/nation/interactive/2021/capitol-riot-arrests-investigation/?iid=lb_complete-coverage-pro-trump-mob-storms-capitol-building_3) (investigating the identity of rioters).

Trump violently besieged the Capitol, trying in vain to stop Congress from certifying Biden’s victory.”<sup>9</sup>

21. Two federal criminal defendants are presently “accused of assaulting Sicknick by spraying a powerful chemical irritant at him during the siege, but prosecutors have not tied that exposure to Sicknick’s death.”<sup>10</sup>

22. As the Post has reported, “[i]n the days after the riot, police and a Justice Department official attributed Sicknick’s death to his efforts to contain the riot.”<sup>11</sup>

23. The District’s chief medical examiner, however, has concluded that Officer Sicknick “suffered two strokes and died of natural causes a day after he confronted rioters at the Jan. 6 insurrection.”<sup>12</sup> Despite the conclusion of the Chief Medical Examiner, questions remain about the causes of Officer Sicknick’s tragic death.

#### **D.C. Mayor Muriel E. Bowser**

24. District of Columbia Mayor Muriel E. Bowser was privy to intelligence, exerted control over the MPD during the Capitol siege, and reassured the District and the nation after the attacks.

25. Mayor Bowser was abreast of the MPD intelligence on the day of the siege and acted affirmatively. On January 6, 2021, as the Post reported, Mayor Bowser was called by D.C.

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<sup>9</sup> Meagan Flynn et al., *Officer Brian Sicknick Remembered as Hero Who Died Defending the U.S. Capitol*, The Washington Post (Feb. 3, 2021), [https://www.washingtonpost.com/local/public-safety/sicknick-honor-capitol/2021/02/02/3878d5ae-6578-11eb-8c64-9595888caa15\\_story.html](https://www.washingtonpost.com/local/public-safety/sicknick-honor-capitol/2021/02/02/3878d5ae-6578-11eb-8c64-9595888caa15_story.html).

<sup>10</sup> Peter Hermann & Spencer S. Hsu, *Capitol Police Officer Brian Sicknick, Who Engaged Rioters, Suffered Two Strokes and Died of Natural Causes, Officials Say*, The Washington Post (Apr. 19, 2021), [https://www.washingtonpost.com/local/public-safety/brian-sicknick-death-strokes/2021/04/19/36d2d310-617e-11eb-afbe-9a11a127d146\\_story.html](https://www.washingtonpost.com/local/public-safety/brian-sicknick-death-strokes/2021/04/19/36d2d310-617e-11eb-afbe-9a11a127d146_story.html).

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

acting police chief Robert J. Contee, “his voice choked by mists of pepper spray, . . . and they agreed to enact a 6 p.m. curfew. Then they met up at a command center and watched video feeds as D.C. officers tried in vain to help their federal counterparts hold back the rioters engaged in acts of insurrection.”<sup>13</sup>

26. Mayor Bowser “held two news conferences in the hours during and after the riot, while federal authorities answered no questions from reporters. In the following days, with near-silence from Trump administration about the attack, Bowser spoke authoritatively to a nation hungry for information and reassurance.”<sup>14</sup>

27. Mayor Bowser’s communications leading up to, during, and directly after the Capitol insurrection will provide Washingtonians, and all Americans, with much-needed answers about whether all levels of leadership responded appropriately to the attack.

### **MPD’s Role in Defending the Capitol**

28. The District of Columbia Metropolitan Police Department historically lends support as crowd control and surge support for protests and demonstrations on federal grounds, including the Capitol grounds.<sup>15</sup>

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<sup>13</sup> David Nakamura & Michael Brice Saddler, *After Coming to the Capitol’s Rescue, D.C. Leaders Seek More Autonomy Under Biden*, The Washington Post (Jan. 9, 2021), [https://www.washingtonpost.com/local/dc-politics/bowser-trump-statehood-capitol/2021/01/09/71b27d78-51d4-11eb-b96e-0e54447b23a1\\_story.html](https://www.washingtonpost.com/local/dc-politics/bowser-trump-statehood-capitol/2021/01/09/71b27d78-51d4-11eb-b96e-0e54447b23a1_story.html).

<sup>14</sup> Julie Zauzmer & Michael Brice-Saddler, *When Trump and Others Were Silent After Capitol Breach, D.C.’s Mayor Stepped Up*, The Washington Post (Jan. 17, 2021), [https://www.washingtonpost.com/local/dc-politics/bowser-inauguration-dc-mayor/2021/01/17/756637ae-55f6-11eb-a817-e5e7f8a406d6\\_story.html](https://www.washingtonpost.com/local/dc-politics/bowser-inauguration-dc-mayor/2021/01/17/756637ae-55f6-11eb-a817-e5e7f8a406d6_story.html).

<sup>15</sup> D.C. Code § 5-133.17 (“Each covered Federal law enforcement agency may enter into a cooperative agreement with the Metropolitan Police Department of the District of Columbia”); *Our History*, United State Capitol Police, <https://www.uscp.gov/the-department/our-history> (noting historically the Capitol Police and the MPD were intertwined).



29. The MPD was dispatched to reinforce Capitol Police on January 6, 2021. As the Post has reported, “As right-wing rioters overwhelmed Capitol Police, killing an officer and badly injuring others, the District dispatched police officers—many of them D.C. residents—and at least 58 of them were injured, too.”<sup>16</sup>

30. The Post reported that the MPD, alongside Capitol Police, attempted to “restore order at the Capitol,”<sup>17</sup> but failed after repeated unanswered requests from MPD Commander Robert Glover for reinforcement and munitions.<sup>18</sup>

31. As the Post has reported, the MPD was unprepared for the Capitol attack that was, in the words of U.S. Senator Gary Peters, “planned in plain sight.”<sup>19</sup>

32. As the Post has reported, “[a]t least seven congressional committees have launched probes into aspects of the Capitol attack.”<sup>20</sup>

33. The MPD has provided video and written documents concerning the events of January 6, 2021 to the United States House Judiciary Committee as part of its investigation into the Capitol riot.

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<sup>16</sup> Robinson Woodward-Burns, *The Best Way to Secure the Capitol is to Make D.C. a State*, The Washington Post (Jan. 14, 2021), <https://www.washingtonpost.com/outlook/2021/01/13/dc-national-guard-bowser-capitol-riot-statehood/>.

<sup>17</sup> Carol D. Leonning et al., *Capitol Breach Prompts Urgent Questions about Security Failures*, The Washington Post (Jan. 7, 2021), [https://www.washingtonpost.com/politics/capitol-breach-security-failures/2021/01/06/e1e09b80-5061-11eb-b96e-0e54447b23a1\\_story.html](https://www.washingtonpost.com/politics/capitol-breach-security-failures/2021/01/06/e1e09b80-5061-11eb-b96e-0e54447b23a1_story.html).

<sup>18</sup> Aaron Blake, *The Big Holes in the First Big Jan. 6 Reports*, The Washington Post (June 8, 2021), <https://www.washingtonpost.com/politics/2021/06/08/very-conspicuous-holes-first-big-jan-6-report/>.

<sup>19</sup> Karoun Demirjian, *Capitol Police Had Intelligence Indicating an Armed Invasion Weeks Before Jan. 6 Riot, Senate Probe Finds*, The Washington Post (June 8, 2021), [https://www.washingtonpost.com/national-security/january-6-senate-investigation/2021/06/08/a8cc5b1e-c7d4-11eb-81b1-34796c7393af\\_story.html](https://www.washingtonpost.com/national-security/january-6-senate-investigation/2021/06/08/a8cc5b1e-c7d4-11eb-81b1-34796c7393af_story.html) (quoting United States Senator Gary Peters).

<sup>20</sup> *Id.*

34. Those public records contain facts, impressions, and other information critical to understanding the now-infamous events at the Capitol on January 6, 2021.

### **The Post’s FOIA Requests and the District’s Denials**

35. Under FOIA, a “public record” includes all “recordings . . . or other documentary materials, regardless of physical form or characteristics prepared, owned, used in the possession of, or retained by a public body.” D.C. Code §§ 2-502(18), (18A); *id.* § 2-539.

36. Pursuant to D.C. law, a public body has fifteen days to respond to a FOIA request. D.C. Code § 2-532(c)(1) (“[A] public body, upon request reasonably describing any public record, shall within 15 days . . . of receipt of any such request either make the requested public record accessible or notify the person making such request of its determination”).

#### **Request 1**

37. On January 7, 2021, Post FOIA Director Nate Jones submitted a FOIA request to the EOM seeking “[a]ll messages sent by Mayor Muriel Bowser on her WhatsApp account and email account between January 5 and January 8, 2021.” The Post also requested fees be waived. This FOIA request (“Request 1”) was assigned handling number 2021-FOIA-02036. A true and correct copy of Request 1 is attached as Exhibit A.

38. The EOM’s response to Request 1 was due January 29, 2021. D.C. Code § 2-532(c)(1).

39. To date, the EOM has not responded to Request 1.

#### **Request 2**

40. On February 19, 2021 Post journalist Shawn Boburg submitted a FOIA request to the OUC, seeking “[a]ll 911 recordings, dispatch communications and CAD entries related to the Jan. 6, 2021 protest and subsequent riot at the U.S. Capitol,” and expressly “limit[ing] the

responsive records to events located in or calls originating from the First and Second police districts from 10 a.m. to 10 p.m. on Jan. 6, 2021.” The Post also requested fees be waived.

41. This FOIA request (“Request 2”) was assigned handling number 2021-FOIA-03235. A true and correct copy of Request 2 is attached as Exhibit B.

42. On March 30, 2021, more than a week after MPD’s statutory deadline to respond had passed, the District’s FOIA system notified Boburg that the status of Request 2 had changed and it was now “In Process.” A true and correct copy of that notice is attached as Exhibit C.

43. On March 30, 2021, MPD denied Request 2. A true and correct copy of that denial is attached as Exhibit D.

44. The MPD denied the request citing FOIA Exemption 3. *See* Ex. D (citing D.C. Code §§ 2-534 (a)(3)(A)(i) and (a)(3)(B)). MPD asserts that the requested records are “part of the ongoing open criminal investigation and enforcement proceedings.” *Id.* MPD further claims, without explanation, that its release could reveal the direction and pace of the investigation, and could lead to attempts to destroy evidence or intimidate witnesses. *Id.*

### **Requests 3, 4, and 5**

45. On February 19, 2021, Boburg submitted a FOIA request to the MPD seeking “[a]ll audio, video and written documents provided to the U.S. House Judiciary Committee or its representatives related to the Jan. 6, 2021 protest and riot at the U.S. Capitol.” The Post also requested fees be waived. This FOIA request (“Request 3”) was assigned handling number 2021-FOIA-03236. A true and correct copy of Request 3 is attached as Exhibit E.

46. Also on February 19, 2021, Boburg submitted a FOIA request to the MPD seeking “[v]ideo taken from fixed security cameras located in the vicinity of the U.S. Capitol building that show the protest and riot from 12 p.m. to 6 p.m. on Jan. 6, 2021,” including “video

from a camera atop a D.C. tower positioned near Third Street Southwest that was used by MPD in command briefings following the Jan. 6 riot.” The Post also requested fees be waived. This FOIA request (“Request 4”) was assigned handling number 2021-FOIA-03237. A true and correct copy of Request 4 is attached as Exhibit F.

47. Also on February 19, 2021, Boburg submitted a FOIA request to the MPD seeking “[a]ll police radio communications -- audio and transcripts of audio -- between D.C. police officers, up to and including the chief of police, and with other law enforcement agencies, including the U.S. Capitol police, on Jan. 6, 2021 regarding the March to Save America rally and the subsequent riot at the U.S. Capitol,” including “communications between the times of 10 a.m. through 10 p.m. on Jan. 6, 2021.” The Post also requested fees be waived. This FOIA request (“Request 5”) was assigned handling number 2021-FOIA-03238. A true and correct copy of Request 5 is attached as Exhibit G.

48. On March 22, 2021, more than a week after MPD’s statutory deadline to respond, the Post received notice that specialist Lisa Archie-Mills had been assigned to Requests 3, 4, and 5. True and correct copies of the District’s notices are attached as Exhibits H, I, and J.

49. The MPD did not seek an extension to fulfil these requests. See Exs. H, I, & J.

50. Neither the MPD nor any other District agency has disclosed any public documents or further contacted the Post regarding Requests 3, 4, or 5.

51. MPD’s responses to Requests 3, 4, and 5 were due March 19, 2021. D.C. Code § 2-532(c)(1).

52. To date, the MPD has failed to respond to Requests 3, 4, and 5.

## **Request 6**

53. On April 20, 2021, Post reporter Peter Hermann submitted a FOIA request to the OCME seeking a copy of “the autopsy report for Brian D. Sicknick, a Capitol police officer who died Jan. 7, a day after the insurrection at the U.S. Capitol.” The FOIA request (“Request 6”) was assigned handling number 2021-FOIA-04598.

54. On April 27, 2021, MPD denied Request 6. A true and correct copy of the MPD’s denial letter is attached hereto as Exhibit K.

55. The MPD denied Request 6, citing FOIA Exemption 2. *See* Ex. K at 1 (citing D.C. Code § 2-534(a)(2)). MPD asserts that releasing the autopsy record would constitute the disclosure of personal information. *See id.*

56. The MPD stated that the OCME “does not release its case files in response to FOIA requests. A direct request to OCME for a case file would need to be accompanied by . . . a court order.” *Id.*

## **COUNT 1**

### **VIOLATION OF FOIA: CONSTRUCTIVE DENIAL OF REQUEST 1**

57. The Post repeats, re-alleges, and incorporates the allegations in the foregoing paragraphs as though fully set forth herein.

58. The EOM and the Mayor’s communications are subject to FOIA. D.C. Code § 2-532(a).

59. Pursuant to FOIA, the EOM must release, in response to a FOIA request, any disclosable public records in its control or possession at the time of the request and provide a lawful reason for withholding any materials as to which it is claiming an exemption.

60. The records responsive to Request 1 are public records.

61. The requested records are within the EOM’s constructive control or possession.

62. The requested records do not fall within any lawful FOIA exemption.

63. The Mayor's failure to disclose the requested public records violates FOIA.

64. The Post is entitled to an order compelling the Mayor to disclose the records that are the subject of Request 1.

### **COUNT 2**

#### **VIOLATION OF FOIA: IMPROPER DENIAL OF REQUEST 2**

65. The Post repeats, re-alleges, and incorporates the allegations in the foregoing paragraphs as though fully set forth herein.

66. The MPD is subject to FOIA. D.C. Code § 2-532(a).

67. Pursuant to FOIA, the MPD must release, in response to a FOIA request, any disclosable public records in its control or possession at the time of the request and provide a lawful reason for withholding any materials as to which it is claiming an exemption.

68. The records responsive to Request 2 are public records.

69. The requested records are within the constructive control or possession of the OUC, and thus are within the constructive control or possession of the MPD.

70. The requested records do not fall within the statutory exemptions cited by MPD or within any other lawful FOIA exemption.

71. The MPD's refusal to disclose the requested public records violates FOIA.

72. The Post is entitled to an order compelling the MPD to disclose the records that are the subject of Request 2.

### **COUNT 3**

#### **VIOLATION OF FOIA: CONSTRUCTIVE DENIAL OF REQUEST 3**

73. The Post repeats, re-alleges, and incorporates the allegations in the foregoing paragraphs as though fully set forth herein.

74. The MPD is subject to FOIA. D.C. Code § 2-532(a).

75. Pursuant to FOIA, the MPD must release, in response to a FOIA request, any disclosable public records in its control or possession at the time of the request and provide a lawful reason for withholding any materials as to which it is claiming an exemption.

76. The records responsive to Request 3 are public records.

77. The requested records are within the MPD's constructive control or possession.

78. The requested records do not fall within any lawful FOIA exemption.

79. The MPD's refusal to disclose the requested public records violates FOIA.

80. The Post is entitled to an order compelling the MPD to disclose the records that are the subject of Request 3.

#### **COUNT 4**

#### **VIOLATION OF FOIA: CONSTRUCTIVE DENIAL OF REQUEST 4**

81. The Post repeats, re-alleges, and incorporates the allegations in the foregoing paragraphs as though fully set forth herein.

82. The MPD is subject to FOIA. D.C. Code § 2-532(a).

83. Pursuant to FOIA, the MPD must release, in response to a FOIA request, any disclosable public records in its control or possession at the time of the request and provide a lawful reason for withholding any materials as to which it is claiming an exemption.

84. The records responsive to Request 4 are public records.

85. The requested records are within the MPD's constructive control or possession.

86. The requested records do not fall within any lawful FOIA exemption.

87. The MPD's refusal to disclose the requested public records violates FOIA.

88. The Post is entitled to an order compelling the MPD to disclose the records that are the subject of Request 4.

**COUNT 5**

**VIOLATION OF FOIA: CONSTRUCTIVE DENIAL OF REQUEST 5**

89. The Post repeats, re-alleges, and incorporates the allegations in the foregoing paragraphs as though fully set forth herein.

90. The MPD is subject to FOIA. D.C. Code § 2-532(a).

91. Pursuant to FOIA, the MPD must release, in response to a FOIA request, any disclosable public records in its control or possession at the time of the request and provide a lawful reason for withholding any materials as to which it is claiming an exemption.

92. The records responsive to Request 5 are public records.

93. The requested records are within the MPD's constructive control or possession.

94. The requested records do not fall within any lawful FOIA exemption.

95. The MPD's refusal to disclose the requested public records violates FOIA.

96. The Post is entitled to an order compelling the MPD to disclose the records that are the subject of Request 5.

**COUNT 6**

**VIOLATION OF FOIA: IMPROPER DENIAL OF REQUEST 6**

97. The Post repeats, re-alleges, and incorporates the allegations in the foregoing paragraphs as though fully set forth herein.

98. The MPD is subject to FOIA. D.C. Code § 2-532(a).

99. Pursuant to FOIA, the MPD must release, in response to a FOIA request, any disclosable public records in its control or possession at the time of the request and provide a lawful reason for withholding any materials as to which it is claiming an exemption.

100. The records responsive to Request 6 are public records.



101. The requested records are within the constructive control or possession of the OCME, and thus are within the constructive control or possession of the MPD.

102. The requested records do not fall within the statutory exemption cited by MPD, or within any other lawful FOIA exemption.

103. The MPD's refusal to disclose the requested public records violates FOIA.

104. The Post is entitled to an order compelling the MPD to disclose the records that are the subject of Request 6.

### **REQUESTED RELIEF**

WHEREFORE, the Post respectfully requests that this Court:


- a. Declare that the documents sought by Requests 1-6 are public records under D.C. Code § 2-531 *et seq.* and must be disclosed;
- b. Declare that the documents sought by Requests 1-6 are within the control of the MPD or EOM under D.C. Code § 2-531 *et seq.* and must be disclosed;
- c. Order the MPD and EOM to conduct a search for and produce to the Post all documents responsive to Requests 1-6 within 10 business days of the Court's order;
- d. Award the Post the costs of this proceeding, including reasonable attorney's fees, as expressly permitted by FOIA; and
- e. Grant the Post such other and further relief as this Court deems just and proper.

Dated: June 23, 2021

Respectfully submitted,

Of counsel:

James A. McLaughlin (#469203)  
Deputy General Counsel &  
Director of Government Affairs  
The Washington Post  
One Franklin Square, N.W.  
Washington, D.C. 20071  
(202) 334-7988  
james.mclaughlin@washpost.com

  
Chad R. Bowman (#484150)  
Charles D. Tobin (#455593)  
Maxwell S. Mishkin (#1031356)  
Margaret N. Strouse (*PHV* forthcoming)  
BALLARD SPAHR LLP  
1909 K Street, N.W., 12th Floor  
Washington, D.C. 20006  
Tel: (202) 661-2200 | Fax: (202) 661-2299  
bowmanchad@ballardspahr.com  
tobinc@ballardspahr.com  
mishkinm@ballardspahr.com  
strousem@ballardspahr.com

*Counsel for Plaintiff The Washington Post*

# Exhibit A

## Request Acknowledgement by DC Government FOIA Portal

FOIA.SystemAdmin@dc.gov <FOIA.SystemAdmin@dc.gov>

Thu 1/7/2021 2:48 PM

To: Jones, Nate <Nate.Jones@washpost.com>

CAUTION: EXTERNAL SENDER

**This is an automated message from the DC Government FOIA system.**

Dear

Nate Jones,

Request Number 2021-FOIA-02036 has been assigned to the request you submitted in relation to:

Request description: 1301

K STREET, N.W. WASHINGTON, D.C. 20071-7403 (202) 334-6000 January 7, 2021 VIA ONLINE FORM  
Re: FOIA REQUEST FOR Mayor Bowser Whatsap Messages and emails from January 5 to January 8, 2021.

Dear Information Officer: Pursuant to the DC Freedom of Information Act,

I hereby request the following records: All messages sent by Mayor Muriel Bowser on her WhatsApp account and email account between January 5 and January 8, 2021. If you decide to withhold any requested records, please be aware of the specific requirements

under D.C. Code § 2-534(b) that you provide any reasonable segregable portion of a requested record after redacting those portions claimed to be exempt, explain in writing the justification for redacting the record, indicate the extent of any redactions on

the portion of the record which is made available or published (except in limited circumstances), and where technically feasible indicate on the redacted portion itself the specific exemption(s) claimed. The requested documents will be made available to the

general public, and this request is not being made for commercial purposes. I am a representative of the news media primarily engaged in disseminating information, urgency to inform the public concerning actual or alleged government activity. I request that

you waive all fees in the public interest because the furnishing of the information sought by this request will primarily benefit the public and is likely to contribute significantly to public understanding of the operations or activities of the government.

If, however, you decline to waive all fees, I am prepared to pay according to the fee schedule set forth in D.C. Mun. Regs., title 1, §408, but request that you notify me if you expect these fees to exceed \$100. I would prefer the request filled electronically,

by e-mail attachment if available or CD-ROM if not. I further request that you disclose the listed documents, as they become available to you, without waiting until all the documents have been assembled. Thank you in advance for your anticipated cooperation

in this matter. I look forward to receiving your response to this request within 15 business days, as the statute requires. If you would like to contact me about this request, please email me at nate.jones@washpost.com . Sincerely, /S/ Nate Jones

In

all future correspondence regarding this request, please reference request number 2021-FOIA-02036. To check for status, please log in <https://foia-dc.gov/palMain.aspx> [[foia-dc.gov](https://foia-dc.gov)] and go to Request Status.

For any questions regarding your request, please contact the FOIA office directly. Find the list of agency Open Government and FOIA contact information

by visiting [FOIA](#)

[Contact Information](#) [[dc.gov](https://dc.gov)]. For ease of reference, we ask that you have your FOIA Request Number available when you contact the FOIA office.

6/7/2021

Mail - Jones, Nate - Outlook

Regards,  
DC Government FOIA Portal

Having  
technical difficulties? Email [FOIA.SystemAdmin@dc.gov](mailto:FOIA.SystemAdmin@dc.gov) or call 202-478-5973

# Exhibit B

**Fw: Request Acknowledgement by DC Government FOIA Portal**

Boburg, Shawn &lt;Shawn.Boburg@washpost.com&gt;

Fri 6/4/2021 4:02 PM

To: Jones, Nate &lt;Nate.Jones@washpost.com&gt;

---

**From:** FOIA.SystemAdmin@dc.gov <FOIA.SystemAdmin@dc.gov>**Sent:** Friday, February 19, 2021 3:56 PM**To:** Boburg, Shawn <Shawn.Boburg@washpost.com>**Subject:** Request Acknowledgement by DC Government FOIA Portal

CAUTION: EXTERNAL SENDER

**This is an automated message from the DC Government FOIA system.**

Dear

Shawn Boburg,

Request Number 2021-FOIA-03235 has been assigned to the request you submitted in relation to:

Request description:

Feb. 19, 2021 District of Columbia Office of Unified Communications 2720 Martin Luther King Jr Ave S Washington, D.C. 20032 Re: FOIA REQUEST Dear Information Officer: Pursuant to the DC Freedom of Information Act, I hereby request the following records: All

911 recordings, dispatch communications and CAD entries related to the Jan. 6, 2021 protest and subsequent riot at the U.S. Capitol. Please limit the responsive records to events located in or calls originating from the First and Second police districts from

10 a.m. to 10 p.m. on Jan. 6, 2021. If you decide to withhold any requested records, please be aware of the specific requirements under D.C. Code § 2-534(b) that you provide any reasonable segregable portion of a requested record after redacting those portions

claimed to be exempt, explain in writing the justification for redacting the record, indicate the extent of any redactions on the portion of the record which is made available or published (except in limited circumstances), and where technically feasible indicate

on the redacted portion itself the specific exemption(s) claimed. The requested documents will be made available to the general public, and this request is not being made for commercial purposes. I am a representative of the news media primarily engaged in

disseminating information, urgency to inform the public concerning actual or alleged government activity. I request that you waive all fees in the public interest because the furnishing of the information sought by this request will primarily benefit the public

and is likely to contribute significantly to public understanding of the operations or activities of the government. If, however, you decline to waive all fees, I am prepared to pay according to the fee schedule set forth in D.C. Mun. Regs., title 1, §408,

but request that you notify me if you expect these fees to exceed \$100. I would prefer the request filled electronically, by e-mail attachment if available or CD-ROM if not. I further request that you disclose the listed documents, as they become available

to you, without waiting until all the documents have been assembled. Thank you in advance for your anticipated cooperation in this matter. I look forward to receiving your response to this request within 15 business days, as the statute requires. If you would

like to contact me about this request, please email me at shawn.boburg@washpost.com or call me at 202-604-7969. Sincerely, Shawn Boburg (Date Range for Record Search: From 01/06/2021 To 01/06/2021)

In

all future correspondence regarding this request, please reference request number 2021-FOIA-03235. To

check for status, please log in <https://foia-dc.gov/paiMain.aspx>

[.foia-dc.gov](https://foia-dc.gov)] and go to Request Status.

For any questions regarding your request, please contact the FOIA office directly. Find the list of agency Open Government and FOIA contact information

by visiting [FOIA](#)

[Contact Information](#) [dc.gov]. For ease of reference, we ask that you have your FOIA Request Number available when you contact the FOIA office.

Regards,

DC Government FOIA Portal

Having

technical difficulties? Email [FOIA.SystemAdmin@dc.gov](mailto:FOIA.SystemAdmin@dc.gov) or call 202-478-5973



# Exhibit C

**Fw: Status Update for Request #2021-FOIA-03235**

Boburg, Shawn &lt;Shawn.Boburg@washpost.com&gt;

Fri 6/4/2021 4:04 PM

To: Jones, Nate &lt;Nate.Jones@washpost.com&gt;

---

**From:** FOIA.SystemAdmin@dc.gov <FOIA.SystemAdmin@dc.gov>**Sent:** Tuesday, March 30, 2021 4:21 PM**To:** Boburg, Shawn <Shawn.Boburg@washpost.com>**Subject:** Status Update for Request #2021-FOIA-03235

CAUTION: EXTERNAL SENDER

**This is an automated message from the DC Government FOIA system.**

Dear

Shawn Boburg,

The status for your request is below. Please log into <https://foia-dc.gov/palMain.aspx> [[foia-dc.gov](https://foia-dc.gov)] and go to Request Status. If you have any questions regarding the status of your request, please contact the agency's FOIA office that you had submitted your FOIA request to. You can communicate directly with the FOIA office by clicking on

Inbox, search the request number, and then click Compose Message. OR, visit [Contact FOIA Office \[dc.gov\]](#) to see a list DC Government FOIA Office's/officer's contact information and have your Request ID ready.

Request status: In Process

Request

ID: 2021-FOIA-03235

Description: Feb. 19, 2021 District of Columbia Office of Unified Communications 2720 Martin Luther King Jr Ave S Washington, D.C. 20032 Re: FOIA REQUEST Dear Information Officer:

Pursuant to the DC Freedom of Information Act, I hereby request the following records: All 911 recordings, dispatch communications and CAD entries related to the Jan. 6, 2021 protest and subsequent riot at the U.S. Capitol. Please limit the responsive records

to events located in or calls originating from the First and Second police districts from 10 a.m. to 10 p.m. on Jan. 6, 2021. If you decide to withhold any requested records, please be aware of the specific requirements under D.C. Code § 2-534(b) that you

provide any reasonable segregable portion of a requested record after redacting those portions claimed to be exempt, explain in writing the justification for redacting the record, indicate the extent of any redactions on the portion of the record which is

made available or published (except in limited circumstances), and where technically feasible indicate on the redacted portion itself the specific exemption(s) claimed. The requested documents will be made available to the general public, and this request

is not being made for commercial purposes. I am a representative of the news media primarily engaged in disseminating information, urgency to inform the public concerning actual or alleged government activity. I request that you waive all fees in the public

interest because the furnishing of the information sought by this request will primarily benefit the public and is likely to contribute significantly to public understanding of the operations or activities of the government. If, however, you decline to waive

all fees, I am prepared to pay according to the fee schedule set forth in D.C. Mun. Regs., title 1, §408, but request that you notify me if you expect these fees to exceed \$100. I would prefer the request filled electronically, by e-mail attachment if available

6/7/2021

Mail - Jones, Nate - Outlook

or CD-ROM if not. I further request that you disclose the listed documents, as they become available to you, without waiting until all the documents have been assembled. Thank you in advance for your anticipated cooperation in this matter. I look forward to

receiving your response to this request within 15 business days, as the statute requires. If you would like to contact me about this request, please email me at [shawn.boburg@washpost.com](mailto:shawn.boburg@washpost.com) or call me at 202-604-7969. Sincerely, Shawn Boburg (Date Range for Record

Search: From 01/06/2021 To 01/06/2021)

Regards,

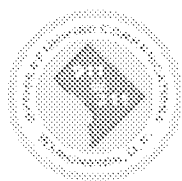
DC Government FOIA Portal

# Exhibit D

**REDACTED**

**From:** heather.mcgaffin@dc.gov <heather.mcgaffin@dc.gov>  
**Sent:** Tuesday, March 30, 2021 4:19 PM  
**To:** Boburg, Shawn <Shawn.Boburg@washpost.com>  
**Subject:** Final Response Letter

CAUTION: EXTERNAL SENDER



GOVERNMENT OF THE DISTRICT OF COLUMBIA  
Office of Unified Communications

PUBLIC SAFETY  
PUBLIC SERVICE

March 30, 2021

Shawn Boburg  
reporter  
Washington Post  
1301 K ST.  
Washington D.C., DC 20071

Dear Shawn Boburg,

This is your final response to your Freedom of Information Act request dated February 19, 2021. Specifically, you requested 2021-FOIA-03235 All 911 recordings, dispatch communications and CAD entries related to the Jan. 6, 2021 protest and subsequent riot at the U.S. Capitol. Please limit the responsive records to events

located in or calls originating from the First and Second police districts from 10 a.m. to 10 p.m. on Jan. 6, 2021. If you decide to withhold any requested records, please be aware of the specific requirements under D.C. Code § 2-534(b) that you provide any reasonable segregable portion of a requested record after redacting those portions claimed to be exempt, explain in writing the justification for redacting the record, indicate the extent of any redactions on the portion of the record which is made available or published (except in limited circumstances), and where technically feasible indicate on the redacted portion itself the specific exemption(s) claimed. The requested documents will be made available to the general public, and this request is not being made for commercial purposes. I am a representative of the news media primarily engaged in disseminating information, urgency to inform the public concerning actual or alleged government activity. I request that you waive all fees in the public interest because the furnishing of the information sought by this request will primarily benefit the public and is likely to contribute significantly to public understanding of the operations or activities of the government. If, however, you decline to waive all fees, I am prepared to pay according to the fee schedule set forth in D.C. Mun. Regs., title 1, §408, but request that you notify me if you expect these fees to exceed \$100. I would prefer the request filled electronically, by e-mail attachment if available or CD-ROM if not. I further request that you disclose the listed documents, as they become available to you, without waiting until all the documents have been assembled. Thank you in advance for your anticipated cooperation in this matter. I look forward to receiving your response to this request within 15 business days, as the statute requires. If you would like to contact me about this request, please email me at [shawn.boburg@washpost.com](mailto:shawn.boburg@washpost.com) or call me at 202-604-7969. Sincerely, Shawn Boburg (Date Range for Record Search: From 01/06/2021 To 01/06/2021).

It has been determined that the information you are seeking is part of an ongoing open criminal investigation and enforcement proceedings. The release of such information could interfere with the enforcement proceedings by revealing the direction and pace of the investigation. It could also lead to attempts to destroy or alter evidence, reveal information about potential witnesses who could then be subjected to intimidation as part of an effort to frustrate future investigative activities, or could place witnesses in danger. For these reasons information about this incident is exempt from disclosure pursuant to D.C. Official Code § 2-534 (a)(3)(A)(i) and (a)(3)(B).

Please know, under D.C. Official Code § 2-537 and 1 DCMR § 412, you have the right to appeal this letter to the Mayor or to the Superior Court of the District of Columbia. If you elect to appeal to the Mayor, your appeal must be in writing and contain "Freedom of Information Act Appeal" or "FOIA Appeal" in the subject line of the letter, as well as, on the outside of the envelope. The appeal must include (1) a copy of the original request; (2) a copy of any written denial; (3) a statement of the circumstances, reasons, and/or arguments advanced in support of disclosure; and (4) a daytime telephone number, an e-mail and/or U.S. mailing address at which you can be reached.

The appeal must be mailed to: The Mayor's Office of Legal Counsel, FOIA Appeal, 1350 Pennsylvania Avenue, N.W., Suite 407, Washington, D.C. 20004. Electronic versions of the same information can instead be e-mailed to the Mayor's Office of Legal Counsel at [foia.appeals@dc.gov](mailto:foia.appeals@dc.gov). Further, a copy of all appeal materials must be forwarded to the Freedom of Information Officer of the involved agency, or to the agency head of that agency, if there is no designated Freedom of Information Officer there.

Failure to follow these administrative steps will result in delay in the processing and commencement of a response to your appeal to the Mayor.

Regards,

Heather McGaffin  
Chief, Special Operations & Investigations  
Office of Unified Communications (OUC)  
2720 Martin Luther King, Jr. Avenue, SE

6/4/2021

Mail - Jones, Nate - Outlook

Washington, DC 20032  
Desk: (202)715-7563  
Mobile: (202) 351-1558  
[heather.mcgaffin@dc.gov](mailto:heather.mcgaffin@dc.gov)

# Exhibit E



**Fw: Request Acknowledgement by DC Government FOIA Portal**

Boburg, Shawn &lt;Shawn.Boburg@washpost.com&gt;

Fri 6/4/2021 4:02 PM

To: Jones, Nate &lt;Nate.Jones@washpost.com&gt;

---

**From:** FOIA.SystemAdmin@dc.gov <FOIA.SystemAdmin@dc.gov>**Sent:** Friday, February 19, 2021 4:00 PM**To:** Boburg, Shawn <Shawn.Boburg@washpost.com>**Subject:** Request Acknowledgement by DC Government FOIA Portal

CAUTION: EXTERNAL SENDER

**This is an automated message from the DC Government FOIA system.**

Dear

Shawn Boburg,

Request Number 2021-FOIA-03236 has been assigned to the request you submitted in relation to:

Request description:

Feb. 19, 2021 Metropolitan Police Department 300 Indiana Ave., NW Room 4125 Washington, DC 20001

Re: FOIA REQUEST Dear Information Officer: Pursuant to the DC Freedom of Information Act, I hereby request the following records: All audio, video and written

documents provided to the U.S. House Judiciary Committee or its representatives related to the Jan. 6, 2021 protest and riot at the U.S. Capitol. If you decide to withhold any requested records, please be aware of the specific requirements under D.C. Code

§ 2-534(b) that you provide any reasonable segregable portion of a requested record after redacting those portions claimed to be exempt, explain in writing the justification for redacting the record, indicate the extent of any redactions on the portion of

the record which is made available or published (except in limited circumstances), and where technically feasible indicate on the redacted portion itself the specific exemption(s) claimed. The requested documents will be made available to the general public,

and this request is not being made for commercial purposes. I am a representative of the news media primarily engaged in disseminating information, urgency to inform the public concerning actual or alleged government activity. I request that you waive all

fees in the public interest because the furnishing of the information sought by this request will primarily benefit the public and is likely to contribute significantly to public understanding of the operations or activities of the government. If, however,

you decline to waive all fees, I am prepared to pay according to the fee schedule set forth in D.C. Mun.

Regs., title 1, §408, but request that you notify me if you expect these fees to exceed \$100. I would prefer the request filled electronically, by e-mail

attachment if available or CD-ROM if not. I further request that you disclose the listed documents, as they become available to you, without waiting until all the documents have been assembled. Thank you in advance for your anticipated cooperation in this

matter. I look forward to receiving your response to this request within 15 business days, as the statute requires. If you would like to contact me about this request, please email me at

shawn.boburg@washpost.com or call me at 202-604-7969. Sincerely, Shawn

Boburg (Date Range for Record Search: From 01/06/2021 To 02/19/2021)

In all future correspondence regarding this request, please reference request number 2021-FOIA-03236. To check for status,

please log in <https://foia-dc.gov/palMain.aspx>  
[.foia-dc.gov](https://foia-dc.gov) and go to Request Status.

For any questions regarding your request, please contact the FOIA office directly. Find the list of agency  
Open Government and FOIA contact information

by visiting [FOIA](#)

[Contact Information](#) [.dc.gov](#). For ease of reference, we ask that you have your FOIA Request Number  
available when you contact the FOIA office.

Regards,

DC Government FOIA Portal

Having

technical difficulties? Email [FOIA.SystemAdmin@dc.gov](mailto:FOIA.SystemAdmin@dc.gov) or call 202-478-5973

# Exhibit F

**Fw: Request Acknowledgement by DC Government FOIA Portal**

Boburg, Shawn &lt;Shawn.Boburg@washpost.com&gt;

Fri 6/4/2021 4:02 PM

To: Jones, Nate &lt;Nate.Jones@washpost.com&gt;

---

**From:** FOIA.SystemAdmin@dc.gov <FOIA.SystemAdmin@dc.gov>**Sent:** Friday, February 19, 2021 4:01 PM**To:** Boburg, Shawn <Shawn.Boburg@washpost.com>**Subject:** Request Acknowledgement by DC Government FOIA Portal

CAUTION: EXTERNAL SENDER

**This is an automated message from the DC Government FOIA system.**

Dear

Shawn Boburg,

Request Number 2021-FOIA-03237 has been assigned to the request you submitted in relation to:

Request description:

Feb. 19, 2021 Metropolitan Police Department 300 Indiana Ave., NW Room 4125 Washington, DC 20001

Re: FOIA REQUEST Dear Information Officer: Pursuant to the DC Freedom of Information Act, I hereby request the following records: Video taken from fixed security

cameras located in the vicinity of the U.S. Capitol building that show the protest and riot from 12 p.m. to 6 p.m. on Jan. 6, 2021. This request includes but is not limited to video from a camera atop a D.C. tower positioned near Third Street Southwest that

was used by MPD in command briefings following the Jan. 6 riot. If you decide to withhold any requested records, please be aware of the specific requirements under D.C. Code § 2-534(b) that you provide any reasonable segregable portion of a requested record

after redacting those portions claimed to be exempt, explain in writing the justification for redacting the record, indicate the extent of any redactions on the portion of the record which is made available or published (except in limited circumstances), and

where technically feasible indicate on the redacted portion itself the specific exemption(s) claimed. The requested documents will be made available to the general public, and this request is not being made for commercial purposes. I am a representative of

the news media primarily engaged in disseminating information, urgency to inform the public concerning actual or alleged government activity. I request that you waive all fees in the public interest because the furnishing of the information sought by this

request will primarily benefit the public and is likely to contribute significantly to public understanding of the operations or activities of the government. If, however, you decline to waive all fees, I am prepared to pay according to the fee schedule set

forth in D.C. Mun. Regs., title 1, §408, but request that you notify me if you expect these fees to exceed \$100. I would prefer the request filled electronically, by e-mail attachment if available or CD-ROM if not. I further request that you disclose the listed

documents, as they become available to you, without waiting until all the documents have been assembled.

Thank you in advance for your anticipated cooperation in this matter. I look forward to receiving your response to this request within 15 business days,

as the statute requires. If you would like to contact me about this request, please email me at shawn.boburg@washpost.com or call me at 202-604-7969. Sincerely, Shawn Boburg (Date Range for Record Search: From 01/06/2021 To 01/06/2021)

In

all future correspondence regarding this request, please reference request number 2021-FOIA-03237. To check for status, please log in <https://foia-dc.gov/paiMain.aspx> [foia-dc.gov](https://foia-dc.gov) and go to Request Status.

For any questions regarding your request, please contact the FOIA office directly. Find the list of agency Open Government and FOIA contact information

by visiting [FOIA](#)

[Contact Information](#) [dc.gov](https://foia-dc.gov). For ease of reference, we ask that you have your FOIA Request Number available when you contact the FOIA office.

Regards,

DC Government FOIA Portal

Having

technical difficulties? Email [FOIA.SystemAdmin@dc.gov](mailto:FOIA.SystemAdmin@dc.gov) or call 202-478-5973

# Exhibit G

**Fw: Request Acknowledgement by DC Government FOIA Portal**

Boburg, Shawn &lt;Shawn.Boburg@washpost.com&gt;

Fri 6/4/2021 4:03 PM

To: Jones, Nate &lt;Nate.Jones@washpost.com&gt;

---

**From:** FOIA.SystemAdmin@dc.gov <FOIA.SystemAdmin@dc.gov>**Sent:** Friday, February 19, 2021 4:03 PM**To:** Boburg, Shawn <Shawn.Boburg@washpost.com>**Subject:** Request Acknowledgement by DC Government FOIA Portal

CAUTION: EXTERNAL SENDER

**This is an automated message from the DC Government FOIA system.**

Dear

Shawn Boburg,

Request Number 2021-FOIA-03238 has been assigned to the request you submitted in relation to:

Request description:

Feb. 19, 2021 Metropolitan Police Department 300 Indiana Ave., NW Room 4125 Washington, DC 20001

Re: FOIA REQUEST Dear Information Officer: Pursuant to the DC Freedom of Information Act, I hereby request the following records: All police radio communications

-- audio and transcripts of audio -- between D.C. police officers, up to and including the chief of police, and with other law enforcement agencies, including the U.S. Capitol police, on Jan. 6, 2021 regarding the March to Save America rally and the subsequent

riot at the U.S. Capitol. This should include communications between the times of 10 a.m. through 10 p.m. on Jan. 6, 2021. If you decide to withhold any requested records, please be aware of the specific requirements under D.C. Code § 2-534(b) that you provide

any reasonable segregable portion of a requested record after redacting those portions claimed to be exempt, explain in writing the justification for redacting the record, indicate the extent of any redactions on the portion of the record which is made available

or published (except in limited circumstances), and where technically feasible indicate on the redacted portion itself the specific exemption(s) claimed. The requested documents will be made available to the general public, and this request is not being made

for commercial purposes. I am a representative of the news media primarily engaged in disseminating information, urgency to inform the public concerning actual or alleged government activity. I request that you waive all fees in the public interest because

the furnishing of the information sought by this request will primarily benefit the public and is likely to contribute significantly to public understanding of the operations or activities of the government. If, however, you decline to waive all fees, I am

prepared to pay according to the fee schedule set forth in D.C. Mun. Regs., title 1, §408, but request that you notify me if you expect these fees to exceed \$100. I would prefer the request filled electronically, by e-mail attachment if available or CD-ROM

if not. I further request that you disclose the listed documents, as they become available to you, without waiting until all the documents have been assembled. Thank you in advance for your anticipated cooperation in this matter. I look forward to receiving

your response to this request within 15 business days, as the statute requires. If you would like to contact me about this request, please email me at shawn.boburg@washpost.com or call me at 202-604-7969. Sincerely, Shawn Boburg (Date Range for Record Search:

From 01/06/2021 To 01/06/2021)

In all future correspondence regarding this request, please reference request number 2021-FOIA-03238. To check for status, please log in <https://foia-dc.gov/palMain.aspx> [\[foia-dc.gov\]](https://foia-dc.gov) and go to Request Status.

For any questions regarding your request, please contact the FOIA office directly. Find the list of agency Open Government and FOIA contact information

by visiting [FOIA](#)

[Contact Information \[dc.gov\]](#). For ease of reference, we ask that you have your FOIA Request Number available when you contact the FOIA office.

Regards,

DC Government FOIA Portal

Having

technical difficulties? Email [FOIA.SystemAdmin@dc.gov](mailto:FOIA.SystemAdmin@dc.gov) or call 202-478-5973



# Exhibit H

**Fw: Acknowledgement Letter 2021-FOIA-03236**

Boburg, Shawn &lt;Shawn.Boburg@washpost.com&gt;

Fri 6/4/2021 4:03 PM

To: Jones, Nate &lt;Nate.Jones@washpost.com&gt;

---

**From:** latrina.crumlin2@dc.gov <latrina.crumlin2@dc.gov>**Sent:** Monday, February 22, 2021 9:50 AM**To:** Boburg, Shawn <Shawn.Boburg@washpost.com>**Cc:** lisa.archie-mills@dc.gov <lisa.archie-mills@dc.gov>; latrina.crumlin2@dc.gov <latrina.crumlin2@dc.gov>**Subject:** Acknowledgement Letter 2021-FOIA-03236

CAUTION: EXTERNAL SENDER

Dear Mr. Boburg,

This office is in receipt of your Freedom of Information Act (FOIA) request. Your FOIA request number is 2021-FOIA-03236 and your assigned FOIA Specialist is **Lisa Archie-Mills**.

If you have any questions regarding your request, please contact your assigned FOIA Specialist, who is included in this e-mail. Be advised, due to the current public health emergency, our office is working remotely and can be reached via e-mail. For ease of reference, we ask that you have your FOIA Request Number available when you contact our office.

**NOTE:** Pursuant to D.C. Official Code § 2-532(c), there is a 15 business day statutory allotted time, subject to the possibility of a ten (10) business day extension from the date of receipt to respond to a **FOIA request**.

If your request is for Body Worn Camera (BWC) footage, there is a 25 business day statutory allotted time, subject to the possibility of 15 working-day extension from the date of receipt to respond to a **Body Worn Camera (BWC) request**.

**REQUEST FOR EXPEDITED SERVICE**

If you seek expedited service relating to your FOIA request, please be advised, there is no provision or authority under the District of Columbia Freedom of Information Act laws, to provide expedited service. Therefore, your request will be processed under the provision of the D.C. Official Code §§ 2-531 et seq.

Regards,

Latrina Crumlin

Staff Assistant

Freedom of Information Act (FOIA) Office

Metropolitan Police Department

300 Indiana Ave NW, RM 4153

Washington, DC 20001

# Exhibit I

**Fw: Acknowledgement Letter 2021-FOIA-03237**

Boburg, Shawn &lt;Shawn.Boburg@washpost.com&gt;

Fri 6/4/2021 4:03 PM

To: Jones, Nate &lt;Nate.Jones@washpost.com&gt;

---

**From:** latrina.crumlin2@dc.gov <latrina.crumlin2@dc.gov>**Sent:** Monday, February 22, 2021 9:52 AM**To:** Boburg, Shawn <Shawn.Boburg@washpost.com>**Cc:** lisa.archie-mills@dc.gov <lisa.archie-mills@dc.gov>; latrina.crumlin2@dc.gov <latrina.crumlin2@dc.gov>**Subject:** Acknowledgement Letter 2021-FOIA-03237

CAUTION: EXTERNAL SENDER

Dear Mr. Boburg,

This office is in receipt of your Freedom of Information Act (FOIA) request. Your FOIA request number is 2021-FOIA-03237 and your assigned FOIA Specialist is **Lisa Archie-Mills**.

If you have any questions regarding your request, please contact your assigned FOIA Specialist, who is included in this e-mail. Be advised, due to the current public health emergency, our office is working remotely and can be reached via e-mail. For ease of reference, we ask that you have your FOIA Request Number available when you contact our office.

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If you seek expedited service relating to your FOIA request, please be advised, there is no provision or authority under the District of Columbia Freedom of Information Act laws, to provide expedited service. Therefore, your request will be processed under the provision of the D.C. Official Code §§ 2-531 et seq.

Regards,

Latrina Crumlin

Staff Assistant

Freedom of Information Act (FOIA) Office

Metropolitan Police Department

300 Indiana Ave NW, RM 4153

Washington, DC 20001

# Exhibit J

**Fw: Acknowledgement Letter 2021-FOIA-03238**

Boburg, Shawn &lt;Shawn.Boburg@washpost.com&gt;

Fri 6/4/2021 4:03 PM

To: Jones, Nate &lt;Nate.Jones@washpost.com&gt;

---

**From:** latrina.crumlin2@dc.gov <latrina.crumlin2@dc.gov>**Sent:** Monday, February 22, 2021 9:54 AM**To:** Boburg, Shawn <Shawn.Boburg@washpost.com>**Cc:** lisa.archie-mills@dc.gov <lisa.archie-mills@dc.gov>; latrina.crumlin2@dc.gov <latrina.crumlin2@dc.gov>**Subject:** Acknowledgement Letter 2021-FOIA-03238

CAUTION: EXTERNAL SENDER

Dear Mr. Boburg,

This office is in receipt of your Freedom of Information Act (FOIA) request. Your FOIA request number is 2021-FOIA-03238 and your assigned FOIA Specialist is **Lisa Archie-Mills**.

If you have any questions regarding your request, please contact your assigned FOIA Specialist, who is included in this e-mail. Be advised, due to the current public health emergency, our office is working remotely and can be reached via e-mail. For ease of reference, we ask that you have your FOIA Request Number available when you contact our office.

**NOTE:** Pursuant to D.C. Official Code § 2-532(c), there is a 15 business day statutory allotted time, subject to the possibility of a ten (10) business day extension from the date of receipt to respond to a **FOIA request**.

If your request is for Body Worn Camera (BWC) footage, there is a 25 business day statutory allotted time, subject to the possibility of 15 working-day extension from the date of receipt to respond to a **Body Worn Camera (BWC) request**.

**REQUEST FOR EXPEDITED SERVICE**

If you seek expedited service relating to your FOIA request, please be advised, there is no provision or authority under the District of Columbia Freedom of Information Act laws, to provide expedited service. Therefore, your request will be processed under the provision of the D.C. Official Code §§ 2-531 et seq.

Regards,

Latrina Crumlin

Staff Assistant

Freedom of Information Act (FOIA) Office

Metropolitan Police Department

300 Indiana Ave NW, RM 4153

Washington, DC 20001

# Exhibit K

**REDACTED**

R rodney.adams@dc.gov  
Tue 4/27/2021 2:27 PM

To: Hermann, Peter

CAUTION: EXTERNAL SENDER

Dear Peter Hermann:

Thank you for your interest in the work of the Office of the Chief Medical Examiner (OCME). This email serves as the final response to your request 2021-FOIA-04598 for the following:

Note: I had initially filed this with DFS -- can close out that request -- 2021-FOIA-04557 -- and replace with this one: Requesting copy of the autopsy report for Brian D. Sicknick, a Capitol police officer who died Jan. 7, a day after the insurrection at the U.S. Capitol. As you are aware the cause and manner of Officer Sicknick's death was made public on April 19. We are seeking the final and complete autopsy report. (Date Range for Record Search: From 01/07/2021 To 04/19/2021) (Date Range for Record Search: From 01/07/2021 To 04/21/2021)

Access to medical examiner records varies widely between jurisdictions. The public policy of the District of Columbia is that all persons are entitled to full and complete information regarding the affairs of government and the official acts of those who represent them as public officials and employees. However, this is tempered by the protection of privacy for individual citizens and their survivors. A mission of OCME is to support the families who have suffered a loss. See National Archives and Records Admin. V. Favish, 541 US 157 (2004). Disclosure of personal information, especially medical records, is not permitted under FOIA. DC Code 2-534(a)(2) and 5 USC 552(b)(6). Accordingly, OCME does not release its case files in response to FOIA requests. A direct request to OCME for a case file would need to be accompanied by 1) an authorization of the next of kin for release of information, 2) a subpoena, or 3) a court order. DC Code 5-1412 and 28 DCMR 5000. Therefore, I must advise you that your request is declined.

Under DC Code 2-537 and 1 DCMR 412, you have the right to appeal this letter to the Mayor or to the Superior Court of the District of Columbia. If you elect to appeal to the Mayor, your appeal must be in writing and contain "Freedom of Information Act Appeal" or "FOIA Appeal" in the subject line of the letter as well on the outside of the envelope. The appeal must include (1) a copy of the original request; (2) a copy of any written denial; (3) a statement of the circumstances, reasons, and/or arguments advanced in support of disclosure; and (4) a daytime telephone number, and e-mail and/or U.S. Mail address at which you can be reached. The appeal may be submitted online [foia-dc.gov] via the DC government Public FOIA Portal. Written appeals may also be mailed to: The Mayor's Office of Legal Counsel, FOIA Appeal; 1350 Pennsylvania Avenue, N.W., Suite 407, Washington, D.C. 20004. Electronic versions of the same information can instead be e-mailed to The Mayor's Office of Legal Counsel at foia\_appeals@dc.gov. Further, a copy of all appeal materials must be forwarded to the OCME FOIA Officer. Failure to follow these administrative steps will result in delay in the processing and commencement of a response to your appeal to the Mayor.



If you have any additional questions regarding this request, you may contact me at this email address.  
All the best,

*Rod Adams*

Rodney K. Adams  
General Counsel  
**Office of the Chief Medical Examiner**  
District of Columbia  
401 E Street SW, Washington, DC 20024

Peter Hermann  
Washington Post  
410-371-5439

---

**From:** Jones, Nate <Nate.Jones@washpost.com>  
**Sent:** Friday, June 11, 2021 1:00 PM  
**To:** Hermann, Peter <Peter.Hermann@washpost.com>  
**Subject:** Re: Consideration of challenge of FOIA denial/ Sicknick autopsy

Many thanks.

One last request from lawyers:

Can you search your email one more time for "04598" to see if an automated acknowledgment to your FOIA from DC pops up. (It will make writing the complaint easier for them if we have an official acknowledgement.)

Thanks!

Nate

---

**From:** Hermann, Peter <Peter.Hermann@washpost.com>  
**Sent:** Friday, June 11, 2021 12:48 PM  
**To:** Jones, Nate <Nate.Jones@washpost.com>  
**Subject:** Re: Consideration of challenge of FOIA denial/ Sicknick autopsy

The copy of the original from the portal:

Requesting copy of the autopsy report for Brian D. Sicknick, a Capitol police officer who died Jan. 7, a day after the insurrection at the U.S. Capitol. As you are aware the cause and manner of Officer Sicknick's death was made public on April 19. We are seeking the final and complete autopsy report. (Date Range for Record Search: From 01/07/2021 To 04/19/2021)

Request made: 4/20

Denial emailed: I received a denial on 4/27/21 (document attached)

haven't heard about zeroing out foia office, forgot, will follow up

Peter Hermann  
Washington Post  
410-371-5439

---

**From:** Jones, Nate <Nate.Jones@washpost.com>  
**Sent:** Friday, June 11, 2021 12:38 PM  
**To:** Hermann, Peter <Peter.Hermann@washpost.com>  
**Subject:** Re: Consideration of challenge of FOIA denial/ Sicknick autopsy

Two more things Peter (sorry!)

Lawyers are also asking if you have your original request for this (or acknowledgement if it was filed through a portal)?

And did you learn anything about the DC Police zeroing their FOIA budget?

Nate

---

**From:** Jones, Nate <Nate.Jones@washpost.com>  
**Sent:** Friday, June 11, 2021 12:32 PM  
**To:** Hermann, Peter <Peter.Hermann@washpost.com>  
**Subject:** Re: Consideration of challenge of FOIA denial/ Sicknick autopsy

Hey Peter,

Quick question from the lawyers on this:

Do you have the date you received it?

Also, they sent as a word file, right? (a bit strange).

Thanks!

Nate

---

**From:** Hermann, Peter <Peter.Hermann@washpost.com>  
**Sent:** Friday, June 4, 2021 3:37 PM  
**To:** Jones, Nate <Nate.Jones@washpost.com>  
**Subject:** Fw: Consideration of challenge of FOIA denial/ Sicknick autopsy

Peter Hermann  
Washington Post  
410-371-5439

---

**From:** Glod, Maria <Maria.Glod@washpost.com>  
**Sent:** Wednesday, May 5, 2021 2:19 PM  
**To:** Kennedy, Jay <jay.kennedy@washpost.com>; McLaughlin, James <James.McLaughlin@washpost.com>; Clark, Kalea <Kalea.Clark@washpost.com>; Semel, Mike <mike.semel@washpost.com>; Norton, Monica <Monica.Norton@washpost.com>; Hermann, Peter <Peter.Hermann@washpost.com>; Jones, Nate <Nate.Jones@washpost.com>  
**Subject:** Consideration of challenge of FOIA denial/ Sicknick autopsy

Hello Kalea, Jim and Jay,

We wanted to discuss a potential challenge of the denial of a FOIA for the autopsy for Capitol Police Officer Brian Sicknick. As you know, the cause of death has created some controversy, with officials initially attributing it to injuries during the riot. It was later ruled natural and as a result of strokes. Charges remain in the assault of Sicknick using chemical irritant.

Nate, who is looped in here, noted that Jeff Leen has inquired about whether we should sue regarding other DC January 6 records. I don't know where that conversation stands, but we wondered if we go that route whether we could consider including the autopsy.

Peter has laid out the request and some background on a similar request below. We also can gather any other information needed.

Others may want to weigh in with additional thoughts.

Thank you,  
Maria

---

**From:** Hermann, Peter <Peter.Hermann@washpost.com>

**Sent:** Tuesday, April 27, 2021 6:14 PM

**To:** Glod, Maria <Maria.Glod@washpost.com>; Semel, Mike <mike.semel@washpost.com>; Norton, Monica <Monica.Norton@washpost.com>

**Cc:** Jones, Nate <Nate.Jones@washpost.com>

**Subject:** FOIA DENIAL FOR SICKNICK AUTOPSY

On 4/21/2021, I filed a FOIA with the D.C. Office of the Chief Medical Examiner for the autopsy report for Capitol Police Officer Brian Sicknick, who died after he fell ill during the Jan. 6 riot at the Capitol.

I received a denial on 4/27/21 (document attached)

Back in 2015, another news organization obtained an autopsy report for Mikhail Lesin, a former Russian press minister, who was found dead in his Dupont Circle hotel room. They obtained the document after challenging a FOIA denial in DC Superior Court. There appears to be an exception in DC code that allows a autopsy report to be made public in cases of great public interest. If Lesin met that standard, surely Sicknick will.

At the time, I was told by D.C. officials that they will never release an autopsy report unless ordered to by a judge. That means the only to get this is to go to court. The declination letter says reports can only be released: 1) an authorization of the next of kin for release of information, 2) a subpoena, or 3) a court order. The Sicknick family has not publicly commented and has indicated they have no plans to do so.

Throwing this out to you to decide what to do. I think there remains a great deal of controversy and mystery surrounding Sicknick's death and the ruling by the ME that it was natural.

Thanks

Peter Hermann  
Washington Post  
410-371-5439





Superior Court of the District of Columbia  
 CIVIL DIVISION  
 Civil Actions Branch  
 500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001  
 Telephone: (202) 879-1133 Website: www.dccourts.gov

WP COMPANY LLC d/b/a THE WASHINGTON POST

Plaintiff

vs.

Case Number **2021 CA 002114 B**

THE DISTRICT OF COLUMBIA

Defendant

**SUMMONS**

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Chad R. Bowman - BALLARD SPAHR LLP

Name of Plaintiff's Attorney

1909 K St., NW, 12th Floor

Address

Washington, DC 20006

202-508-1120

Telephone

如需翻译, 请打电话 (202) 879-4828

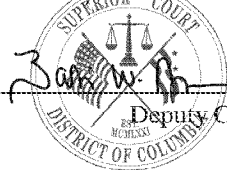
Veillez appeler au (202) 879-4828 pour une traduction

Đề có một bài dịch, hãy gọi (202) 879-4828

법익을 원하 사연, (202) 879-4828로 전화주세요

የአጭር ትርጉም ለማግኘት (202) 879-4828 ይያው቉

Clerk of the Court



By

*Chad R. Bowman*

Deputy Clerk

Date

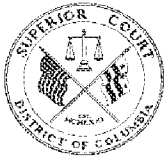
6/25/2021

**IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.**

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español



**TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA  
DIVISIÓN CIVIL**

**Sección de Acciones Civiles**

500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001

Teléfono: (202) 879-1133 Sitio web: [www.dccourts.gov](http://www.dccourts.gov)

WP COMPANY LLC d/b/a THE WASHINGTON POST

Demandante

contra

Número de Caso: \_\_\_\_\_

THE DISTRICT OF COLUMBIA

Demandado

**CITATORIO**

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

Chad R. Bowman - BALLARD SPAHR LLP

*SECRETARIO DEL TRIBUNAL*

Nombre del abogado del Demandante

1909 K St., NW, 12th Floor

Por: \_\_\_\_\_

Dirección

Washington, DC 20006

Subsecretario

202-508-1120

Fecha \_\_\_\_\_

Teléfono

如需翻译, 请打电话 (202) 879-4828

Veillez appeler au (202) 879-4828 pour une traduction

Đề có một bản dịch, hãy gọi (202) 879-4828

반드시 통역사에게 (202) 879-4828 으로 전화하십시오

የአማርኛ ትርጉም ለማግኘት (202) 879-4828 ይያውቱ

**IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.**

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés  
See reverse side for English original

# Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH

## INFORMATION SHEET

WP COMPANY LLC d/b/a  
THE WASHINGTON POST

vs

THE DISTRICT OF COLUMBIA

Case Number: **2021 CA 002114 B**

Date: JUNE 23, 2021

One of the defendants is being sued  
in their official capacity.

Name: <i>(Please Print)</i> Chad R. Bowman	Relationship to Lawsuit
Firm Name: BALLARD SPAHR LLP	<input checked="" type="checkbox"/> Attorney for Plaintiff
Telephone No.: (202) 661-2200	<input type="checkbox"/> Self (Pro Se)
Six digit Unified Bar No.: 484150	<input type="checkbox"/> Other: _____

TYPE OF CASE:  Non-Jury  6 Person Jury  12 Person Jury  
Demand: \$ Declaratory relief Other: \_\_\_\_\_

### PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: \_\_\_\_\_ Judge: \_\_\_\_\_ Calendar #: \_\_\_\_\_

Case No.: \_\_\_\_\_ Judge: \_\_\_\_\_ Calendar#: \_\_\_\_\_

### NATURE OF SUIT: *(Check One Box Only)*

#### A. CONTRACTS

#### COLLECTION CASES

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> 01 Breach of Contract        | <input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent                            | <input type="checkbox"/> 16 Under \$25,000 Consent Denied |
| <input type="checkbox"/> 02 Breach of Warranty        | <input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent                             | <input type="checkbox"/> 18 OVER \$25,000 Consent Denied  |
| <input type="checkbox"/> 06 Negotiable Instrument     | <input type="checkbox"/> 27 Insurance/Subrogation  | <input type="checkbox"/> 26 Insurance/Subrogation         |
| <input type="checkbox"/> 07 Personal Property         | Over \$25,000 Pltf. Grants Consent   | Over \$25,000 Consent Denied                              |
| <input type="checkbox"/> 13 Employment Discrimination | <input type="checkbox"/> 07 Insurance/Subrogation  | <input type="checkbox"/> 34 Insurance/Subrogation         |
| <input type="checkbox"/> 15 Special Education Fees    | Under \$25,000 Pltf. Grants Consent  | Under \$25,000 Consent Denied                             |
|   | <input type="checkbox"/> 28 Motion to Confirm Arbitration<br>Award (Collection Cases Only) |   |

#### B. PROPERTY TORTS

- |   |   |                                      |
|---|---|--------------------------------------|
| <input type="checkbox"/> 01 Automobile                          | <input type="checkbox"/> 03 Destruction of Private Property | <input type="checkbox"/> 05 Trespass |
| <input type="checkbox"/> 02 Conversion                          | <input type="checkbox"/> 04 Property Damage                 |                                      |
| <input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102 (a) |   |                                      |

#### C. PERSONAL TORTS

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> 01 Abuse of Process            | <input type="checkbox"/> 10 Invasion of Privacy                              | <input type="checkbox"/> 17 Personal Injury- (Not Automobile,<br>Not Malpractice) |
| <input type="checkbox"/> 02 Alienation of Affection     | <input type="checkbox"/> 11 Libel and Slander                                | <input type="checkbox"/> 18 Wrongful Death (Not Malpractice)                      |
| <input type="checkbox"/> 03 Assault and Battery         | <input type="checkbox"/> 12 Malicious Interference                           | <input type="checkbox"/> 19 Wrongful Eviction                                     |
| <input type="checkbox"/> 04 Automobile- Personal Injury | <input type="checkbox"/> 13 Malicious Prosecution                            | <input type="checkbox"/> 20 Friendly Suit   |
| <input type="checkbox"/> 05 Deceit (Misrepresentation)  | <input type="checkbox"/> 14 Malpractice Legal                                | <input type="checkbox"/> 21 Asbestos  |
| <input type="checkbox"/> 06 False Accusation            | <input type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death)   | <input type="checkbox"/> 22 Toxic/Mass Torts                                      |
| <input type="checkbox"/> 07 False Arrest                | <input type="checkbox"/> 16 Negligence- (Not Automobile,<br>Not Malpractice) | <input type="checkbox"/> 23 Tobacco   |
| <input type="checkbox"/> 08 Fraud                       |  | <input type="checkbox"/> 24 Lead Paint  |

SEE REVERSE SIDE AND CHECK HERE IF USED

# Information Sheet, Continued

## C. OTHERS

- |   |   |
|---|---|
| <input type="checkbox"/> 01 Accounting                                  | <input type="checkbox"/> 17 Merit Personnel Act (OEA)   |
| <input type="checkbox"/> 02 Att. Before Judgment                        | (D.C. Code Title 1, Chapter 6)  |
| <input type="checkbox"/> 05 Ejectment                                   | <input type="checkbox"/> 18 Product Liability   |
| <input type="checkbox"/> 09 Special Writ/Warrants<br>(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,<br>Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication                        | <input type="checkbox"/> 29 Merit Personnel Act (OHR)   |
| <input type="checkbox"/> 11 Writ of Replevin                            | <input type="checkbox"/> 31 Housing Code Regulations  |
| <input type="checkbox"/> 12 Enforce Mechanics Lien                      | <input type="checkbox"/> 32 Qui Tam   |
| <input checked="" type="checkbox"/> 16 Declaratory Judgment             | <input type="checkbox"/> 33 Whistleblower   |

## II.

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name                                 | <input type="checkbox"/> 15 Libel of Information                                    | <input type="checkbox"/> 21 Petition for Subpoena<br>[Rule 28-I (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic                      | <input type="checkbox"/> 19 Enter Administrative Order as<br>Judgment [ D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien                   |
| <input type="checkbox"/> 08 Foreign Judgment/International                 | 2-1802.03 (h) or 32-151 9 (a)]  | <input type="checkbox"/> 23 Rule 27(a)(1)<br>(Perpetuate Testimony)  |
| <input type="checkbox"/> 13 Correction of Birth Certificate                | <input type="checkbox"/> 20 Master Meter (D.C. Code §                               | <input type="checkbox"/> 24 Petition for Structured Settlement       |
| <input type="checkbox"/> 14 Correction of Marriage<br>Certificate          | 42-3301, et seq.)   | <input type="checkbox"/> 25 Petition for Liquidation                 |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle)  |   |  |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) |   |  |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other)    |   |  |

## D. REAL PROPERTY

- |  |  |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate                | <input type="checkbox"/> 08 Quiet Title                                  |
| <input type="checkbox"/> 12 Specific Performance                     | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted           |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain)            | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied            |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale       | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) |  |

/s/Chad R. Bowman

Attorney's Signature

June 23, 2021

Date



IN THE SUPERIOR COURT  
FOR THE DISTRICT OF COLUMBIA

CIVIL DIVISION

WP COMPANY LLC  
d/b/a THE WASHINGTON POST,

Plaintiff,

v.

THE DISTRICT OF COLUMBIA,

Defendant.

Case No. **2021 CA 002114 B**

**CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the D.C. Superior Court Rules of Civil Procedure, undersigned counsel for WP Company LLC d/b/a The Washington Post hereby certify that WP Company LLC is a wholly owned subsidiary of Nash Holdings LLC, which is privately held and does not have any outstanding securities in the hands of the public.

Dated: June 23, 2021

Respectfully submitted,

BALLARD SPAHR LLP



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*Counsel for Plaintiff WP Company LLC d/b/a  
The Washington Post*



**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**  
**CIVIL DIVISION Civil Actions Branch**  
 500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001  
 Telephone: (202) 879-1133 • Website: [www.dccourts.gov](http://www.dccourts.gov)

WP COMPANY LLC

Vs.

C.A. No. 2021 CA 002114 B

THE DISTRICT OF COLUMBIA

**INITIAL ORDER AND ADDENDUM**

**Pursuant to D.C. Code § 11-906 and District of Columbia Superior Court Rule of Civil Procedure**

**("Super. Ct. Civ. R.") 40-1, it is hereby ORDERED as follows:**

(1) This case is assigned to the judge and calendar designated below. All future filings in this case shall bear the calendar number and the judge's name beneath the case number in the caption.

(2) Within 60 days of the filing of the complaint, plaintiff must file proof of service on each defendant of copies of (a) the summons, (b) the complaint, and (c) this Initial Order and Addendum. The court will dismiss the claims against any defendant for whom such proof of service has not been filed by this deadline, unless the court extended the time for service under Rule 4(m).

(3) Within 21 days of service (unless otherwise provided in Rule 12), each defendant must respond to the complaint by filing an answer or other responsive pleading. The court may enter a default and a default judgment against any defendant who does not meet this deadline, unless the court extended the deadline under Rule 55(a).

(4) At the time stated below, all counsel and unrepresented parties shall participate in a remote hearing to establish a schedule and discuss the possibilities of settlement. Counsel shall discuss with their clients **before** the hearing whether the clients are agreeable to binding or non-binding arbitration. **This order is the only notice that parties and counsel will receive concerning this hearing.**

(5) If the date or time is inconvenient for any party or counsel, the Civil Actions Branch may continue the Conference **once**, with the consent of all parties, to either of the two succeeding Fridays. To reschedule the hearing, a party or lawyer may call the Branch at (202) 879-1133. Any such request must be made at least seven business days before the scheduled date.

No other continuance of the conference will be granted except upon motion for good cause shown.

(6) Parties are responsible for obtaining and complying with all requirements of the General Order for Civil cases, each judge's Supplement to the General Order and the General Mediation Order. Copies of these orders are available in the Courtroom and on the Court's website <http://www.dccourts.gov/>.

**Chief Judge Anita M. Josey-Herring**

Case Assigned to: Judge JOSE M LOPEZ

Date: June 25, 2021

Initial Conference: **REMOTE HEARING - DO NOT COME TO COURTHOUSE**  
**SEE REMOTE HEARING INSTRUCTIONS ATTACHED TO INITIAL ORDER**

9:30 am, Friday, September 24, 2021

Location: Courtroom 212

500 Indiana Avenue N.W.

WASHINGTON, DC 20001

## **ADDENDUM TO INITIAL ORDER AFFECTING ALL MEDICAL MALPRACTICE CASES**

D.C. Code § 16-2821, which part of the Medical Malpractice Proceedings Act of 2006, provides, "[a]fter action is filed in the court against a healthcare provider alleging medical malpractice, the court shall require the parties to enter into mediation, without discovery or, if all parties agree[,] with only limited discovery that will not interfere with the completion of mediation within 30 days of the Initial Scheduling and Settlement Conference ('ISSC'), prior to any further litigation in an effort to reach a settlement agreement. The early mediation schedule shall be included in the Scheduling Order following the ISSC. Unless all parties agree, the stay of discovery shall not be more than 30 days after the ISSC."

To ensure compliance with this legislation, on or before the date of the ISSC, the Court will notify all attorneys and *pro se* parties of the date and time of the early mediation session and the name of the assigned mediator. Information about the early mediation date also is available over the internet at <https://www.dccourts.gov/pa/>. To facilitate this process, all counsel and *pro se* parties in every medical malpractice case are required to confer, jointly complete and sign an EARLY MEDIATION FORM, which must be filed no later than ten (10) calendar days prior to the ISSC. D.C. Code § 16-2825 Two separate Early Mediation Forms are available. Both forms may be obtained at [www.dccourts.gov/medmalmediation](http://www.dccourts.gov/medmalmediation). One form is to be used for early mediation with a mediator from the multi-door medical malpractice mediator roster; the second form is to be used for early mediation with a private mediator. Plaintiff's counsel is responsible for eFiling the form and is required to e-mail a courtesy copy to [earlymedmal@dcsc.gov](mailto:earlymedmal@dcsc.gov). Unrepresented plaintiffs who elect not to eFile must either mail the form to the Multi-Door Dispute Resolution Office at, Suite 2900, 410 E Street, N.W., Washington, DC 20001, or deliver if in person if the Office is open for in-person visits.

A roster of medical malpractice mediators available through the Court's Multi-Door Dispute Resolution Division, with biographical information about each mediator, can be found at [www.dccourts.gov/medmalmediation/mediatorprofiles](http://www.dccourts.gov/medmalmediation/mediatorprofiles). All individuals on the roster are judges or lawyers with at least 10 years of significant experience in medical malpractice litigation. D.C. Code § 16-2823(a). If the parties cannot agree on a mediator, the Court will appoint one. D.C. Code § 16-2823(b).

The following people are required by D.C. Code § 16-2824 to attend personally the Early Mediation Conference: (1) all parties; (2) for parties that are not individuals, a representative with settlement authority; (3) in cases involving an insurance company, a representative of the company with settlement authority; and (4) attorneys representing each party with primary responsibility for the case.

No later than ten (10) days after the early mediation session has terminated, Plaintiff must eFile with the Court a report prepared by the mediator, including a private mediator, regarding: (1) attendance; (2) whether a settlement was reached; or, (3) if a settlement was not reached, any agreements to narrow the scope of the dispute, limit discovery, facilitate future settlement, hold another mediation session, or otherwise reduce the cost and time of trial preparation. D.C. Code § 16-2826. Any Plaintiff who is unrepresented may mail the form to the Civil Actions Branch at [address] or deliver it in person if the Branch is open for in-person visits. The forms to be used for early mediation reports are available at [www.dccourts.gov/medmalmediation](http://www.dccourts.gov/medmalmediation).

Chief Judge Anita M. Josey-Herring

## Civil Remote Hearing Instructions for Participants

The following instructions are for participants who are scheduled to have cases heard before a Civil Judge in a **Remote Courtroom**

### **Option 1: (AUDIO ONLY/Dial-in by Phone):**

Toll 1 (844) 992-4762 or (202) 860-2110, enter the Meeting ID from the attachment followed by #, press again to enter session.

- *Please call in no sooner than 5 minutes before your scheduled hearing time. Once you have joined the session, please place your phone on mute until directed otherwise. If you should happen to get disconnected from the call, please call back in using the phone number and access number provided and the courtroom clerk will mute your call until the appropriate time.*

If you select **Option 2** or **Option 3** use the Audio Alternative

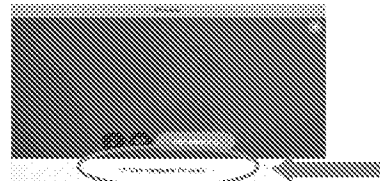
### **Option 2: (LAPTOP/ DESKTOP USERS 1):**

Open Web Browser in Google Chrome and copy and paste following address from the next page:  
<https://dccourts.webex.com/meet/XXXXXXXX>

### **Option 3: (LAPTOP/ DESKTOP USERS 2):**

Open Web Browser in Google Chrome and copy and paste following address  
<https://dccourts.webex.com> Select **Join**, enter the Meeting ID from the next page

**AUDIO ALTERNATIVE:** Instead of automatically using **USE COMPUTER FOR AUDIO**, select **CALL-IN** and follow the **CALL-IN** prompt window. Use a cell phone or desk phone. You will be heard clearer if you **do not** place your phone on **SPEAKER**. It is very important that you enter the **ACCESS ID #** so that your audio is matched with your video.



### **Option 4: (Ipad/SMART PHONE/TABLET):**

- Go to App Store, Download WebEx App (Cisco WebEx Meetings)
- Sign into the App with your Name and Email Address
- Select Join Meeting
- Enter address from the next page: <https://dccourts.webex.com/meet/XXXXXXXX>
- Click join and make sure your microphone is muted and your video is unmuted (if you need to be seen). If you only need to speak and do not need to be seen, use the audio only option.
- When you are ready click "Join Meeting". If the host has not yet started the meeting, you will be placed in the lobby until the meeting begins.

**For Technical Questions or issues Call: (202) 879-1928, Option #2**

Superior Court of the District of Columbia  
Public Access for Remote Court Hearings  
(Effective August 24, 2020)

**The current telephone numbers for all remote hearings are: 202-860-2110 (local) or 844-992-4726 (toll free).** After dialing the number, enter the WebEx Meeting ID as shown below for the courtroom. Please click a WebEx Direct URL link below to join the hearing online.

Audio and video recording; taking pictures of remote hearings; and sharing the live or recorded remote hearing by rebroadcasting, live-streaming or otherwise are not allowed

Division	Courtroom	Types of Hearings Scheduled in Courtroom	Public Access via WebEx	
			WebEx Direct URL	WebEx Meeting ID
Auditor Master	206	Auditor Master Hearings	<a href="https://dccourts.webex.com/meet/ctbaudmaster">https://dccourts.webex.com/meet/ctbaudmaster</a>	129 648 5606
Civil	100	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dccourts.webex.com/meet/ctb100">https://dccourts.webex.com/meet/ctb100</a>	129 846 4145
	205	Foreclosure Matters	<a href="https://dccourts.webex.com/meet/ctb205">https://dccourts.webex.com/meet/ctb205</a>	129 814 7399
	212	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dccourts.webex.com/meet/ctb212">https://dccourts.webex.com/meet/ctb212</a>	129 440 9070
	214	Title 47 Tax Liens; and Foreclosure Hearings	<a href="https://dccourts.webex.com/meet/ctb214">https://dccourts.webex.com/meet/ctb214</a>	129 942 2620
	219	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dccourts.webex.com/meet/ctb219">https://dccourts.webex.com/meet/ctb219</a>	129 315 2924
	221	Civil 1 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dccourts.webex.com/meet/ctb221">https://dccourts.webex.com/meet/ctb221</a>	129 493 5162
	318	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dccourts.webex.com/meet/ctb318">https://dccourts.webex.com/meet/ctb318</a>	129 801 7169
	320	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dccourts.webex.com/meet/ctb320">https://dccourts.webex.com/meet/ctb320</a>	129 226 9879

400	Judge in Chambers Matters including Temporary Restraining Orders, Preliminary Injunctions and Name Changes	<a href="https://dcourts.webex.com/meet/ctb400">https://dcourts.webex.com/meet/ctb400</a>	129 339 7379
415	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	<a href="https://dcourts.webex.com/meet/ctb415">https://dcourts.webex.com/meet/ctb415</a>	129 314 3475
516		<a href="https://dcourts.webex.com/meet/ctb516">https://dcourts.webex.com/meet/ctb516</a>	129 776 4396
517		<a href="https://dcourts.webex.com/meet/ctb517">https://dcourts.webex.com/meet/ctb517</a>	129 911 6415
518		<a href="https://dcourts.webex.com/meet/ctb518">https://dcourts.webex.com/meet/ctb518</a>	129 685 3445
519		<a href="https://dcourts.webex.com/meet/ctb519">https://dcourts.webex.com/meet/ctb519</a>	129 705 0412
JM-4		<a href="https://dcourts.webex.com/meet/ctbjm4">https://dcourts.webex.com/meet/ctbjm4</a>	129 797 7557
A-47	Housing Conditions Matters	<a href="https://dcourts.webex.com/meet/ctba47">https://dcourts.webex.com/meet/ctba47</a>	129 906 2065
B-52	Debt Collection and Landlord and Tenant Trials	<a href="https://dcourts.webex.com/meet/ctbb52">https://dcourts.webex.com/meet/ctbb52</a>	129 793 4102
B-53	Landlord and Tenant Matters including Lease Violation Hearings and Post Judgment Motions	<a href="https://dcourts.webex.com/meet/ctbb53">https://dcourts.webex.com/meet/ctbb53</a>	129 913 3728
B-109	Landlord and Tenant Matters	<a href="https://dcourts.webex.com/meet/ctbb109">https://dcourts.webex.com/meet/ctbb109</a>	129 127 9276
B-119	Small Claims Hearings and Trials	<a href="https://dcourts.webex.com/meet/ctbb119">https://dcourts.webex.com/meet/ctbb119</a>	129 230 4882