[ORAL ARGUMENT NOT YET SCHEDULED]

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

United States Department of the Treasury, **Petitioner-Appellant,** **v.** **Dennis Black; Charles Cunningham; Kenneth Hollis; Delta Salaried Retirees Association,** **Respondents-Appellees.**	**Nos. 17-5142, 17-5164**

OPPOSITION TO RESPONDENTS' MOTION FOR SUMMARY DISPOSITION

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INTRODUCTION AND SUMMARY

The district court ordered the Department of the Treasury (Treasury) to disclose 63 documents that the court held were covered by the presidential communications privilege. In our motion for a stay pending appellate review, we showed that the district court's order was premised on clear and significant error. The district court applied the wrong legal standard and failed to engage in the analysis required by the test it purported to apply. Nothing in respondents' motion for summary disposition casts any doubt on that conclusion, let alone demonstrates that the district court's order was clearly correct.

Despite the district court's clear error in this case, the government has not moved for summary disposition, recognizing that the Court may regard this procedure as inappropriate in a case raising issues of such significance. But, if not for the importance of the question presented, summary reversal—not summary affirmance—might well be appropriate.

Respondents fare no better in urging that this Court cannot review the district court's error either on appeal or in the exercise of its mandamus authority and that, instead, judicial review to vindicate the privilege asserted by the Office of the President can be obtained only if the Treasury official with custody of the documents takes the remarkable step of going into contempt, in conflict with the official's duty to faithfully execute the laws. In making this argument, respondents ignore the nature of the presidential communications privilege, which is "fundamental to the operation of

Government" and "inextricably rooted in the separation of powers under the Constitution." *United States v. Nixon,* 418 U.S. 683, 708 (1974). The privilege is "necessary to guarantee the candor of presidential advisers and to provide '[a] President and those who assist him . . . [with] free[dom] to explore alternatives in the process of shaping policies and making decisions and to do so in a way many would be unwilling to express except privately.'" *In re Sealed Case*, 121 F.3d 729, 743 (D.C. Cir. 1997) (quoting *Nixon*, 418 U.S. at 708).

The order here concludes the controversy between respondents and Treasury in the District Court for the District of Columbia. The parties to the litigation in the Eastern District of Michigan have played no part in the assertion of the presidential communications privilege, and Treasury will have no right of appeal from the final judgment of that court. As explained below, appellate review is thus proper pursuant to 28 U.S.C. § 1291. And even assuming that the district court's disclosure order were not reviewable as a final order or under the collateral order doctrine, the Court would properly exercise its mandamus authority to correct the district court's clear and significant error.

STATEMENT

A. The Underlying Litigation

Plaintiffs in the underlying action (respondents in this action) are former employees of auto parts manufacturer Delphi Corporation and beneficiaries of the pension plan maintained by Delphi for its salaried workers.

As relevant here, respondents sued the Pension Benefit Guaranty Corporation (PBGC) in the Eastern District of Michigan in 2009, alleging that the PBGC wrongly terminated their pension plan. Respondents challenge the termination under a provision of the Employee Retirement Income Security Act (ERISA) that states that the PBGC may "institute proceedings" to terminate a plan if certain determinations are made, 29 U.S.C. § 1342(a)(1)-(4), and may then seek a judicial "decree adjudicating that the plan must be terminated in order to protect the interests of the participants or to avoid any unreasonable deterioration of the financial condition of the plan or any unreasonable increase in the liability of the fund," *id.* § 1342(c)(1). In this case, as in many others, the PBGC did not seek a judicial decree but instead entered into an agreement with the plan administrator and terminated the plan.

In their complaint, respondents alleged that Delphi was "under strong pressure by the federal government" to agree to terminate the pension plan in order to "further the government's interest in restructuring the auto industry," and respondents claim this allegation bears on the court's statutory inquiry. Second Am. Compl. ¶ 27, Dkt. No. 145, *PBGC*, No. 09-cv-13616 (E.D. Mich.) (Add.[1] 86-87).

[1] References to "Add." refer to the addendum Treasury filed with its motion for stay.

B. Third-Party Subpoenas

1. Motions to Quash

Pursuant to the then-applicable version of Federal Rule of Civil Procedure 45(a), respondents issued subpoenas in the United States District Court for the District of Columbia to Treasury seeking various documents and depositions.

In moving to quash, the government urged, among other things, that the requested materials are cumulative and duplicative—particularly in light of the extensive discovery already obtained by the respondents, depositions in a related proceeding, and testimony at seven congressional hearings where the termination of the Delphi plan was discussed. *See* Dkt. No. 15, at 11-13.

On June 19, 2014, the district court denied the government's renewed motion to quash. Dkt. No. 27, at 1 (Add. 54).

2. Motion to Compel

a. During 2014 and 2015, Treasury produced thousands of documents. On July 9, 2015, respondents moved to compel production of the remaining documents that Treasury had withheld or produced in redacted form based on assertions of various privileges, including the documents withheld under the presidential communications privilege. Dkt. No. 30, at 2. *See also* Dkt. No. 35-3, at 1-4 (declaration of Deputy White House Counsel formally asserting the presidential communications privilege over 63 documents) (Add. 50-53).

The district court ordered the government to submit all of the withheld materials for *in camera*, ex parte review, along with explanations for the privileges asserted. Minute Orders 6/17/16, 7/15/16 (Add. 9-10). The government did so on July 25, 2016. Dkt. No. 40.

b. On December 20, 2016, the court ordered Treasury to produce to respondents 120 documents that had been withheld solely on deliberative process grounds. Dkt. No. 42, at 4 (Add. 39). The government complied on January 10, 2017.

The court's December 20 order also directed Treasury to submit a revised privilege log along with the relevant documents for *in camera* review, Dkt. No. 42, at 13 (Add. 48), which the government did, Dkt. No. 43.

c. On April 13, 2017, the district court ordered the government to produce all 63 documents over which it asserted the presidential communications privilege. Dkt. No. 45, at 3-11 (Add. 19-27). The court described the documents as falling into four categories: "(1) drafts of presidential speeches; (2) personal requests for information by President Obama; (3) draft memoranda from staffers to Dr. Lawrence Summers the Director of the National Economic Council, Assistant to the President for Economic Policy, and co-chair of the Presidential Task Force on the Auto Industry ('Auto Task Force'); and (4) electronic mail conversations among Auto Team members concerning advice to be provided to the President." *Id.* at 4 (footnotes omitted) (Add. 20).

The court held that the presidential communications privilege is plainly applicable. Dkt. No. 45, at 4-10 (Add. 20-26) (rejecting respondent's arguments to the contrary). The court also held, however, that the privilege was overcome by respondents' need for the documents. *Id.* at 11 (Add. 27).

d. On April 28, 2017, the government requested a stay pending any appellate review. Dkt. No. 46. On May 17, the district court directed the government to file a motion for reconsideration, which the government filed on May 22. On June 7, the district court granted the motion in limited part. Dkt. No. 53 (Add. 14). The court "modified" its prior order to require the government to produce "only . . . those portions of the documents that relate to General Motors, Delphi Corporation, or the Pension Benefit Guaranty Corporation." *Id.* at 3 (Add. 16). The district court ordered the government to "produce the redacted versions of those 63 documents to respondents by no later than June 30, 2017." *Ibid.* And the court ordered that "until the time for seeking appellate review passes—and during the pendency of any appeal should one be taken—the 63 documents shall remain under seal in Chambers." *Ibid.*

e. On June 12, 2017, the government timely noticed an appeal. (Add. 11-12). On June 19, the government asked the district court to clarify the nature of the production order and again sought a stay. Dkt. No. 58. On June 23, the district court vacated the portion of its June 7 order requiring production of the documents Treasury asserted were subject to the presidential communications privilege, so that

the court could give further consideration to the government's stay request and the respondents' response. Minute Order 6/23/17 (Add. 12).

On July 12, the court denied the government's request for a stay. The court ordered Treasury to "produce the portions of the documents at issue that relate to (1) General Motors, (2) Delphi Corporation, or (3) the Pension Benefit Guaranty Corporation by no later than July 21, 2017 pursuant to a protective order agreed to by the parties." Minute Order 7/12/17 (Add. 13). The court stated that it was "persuaded by respondents' arguments that further delay could cause substantial harm to respondents, who are pensioners in varying stages of retirement and who claim that production of these documents will trigger new discovery and dispositive motion deadlines in the underlying litigation, which has been pending for over eight years." *Ibid.* The court also observed that "[s]hould Treasury succeed in its appeal, any alleged harm to Treasury from compliance with this Order may be remedied through exclusion of the protected material and its fruits from evidence. See Mohawk Indus., Inc. v. Carpenter, 558 U.S. 100, 109, 112 (2009)." *Ibid.* (original formatting).

3. Court of Appeals Proceedings

On July 17, the government moved in this Court for a stay of the district court's disclosure order. On July 18, the Court entered an order granting an administrative stay pending resolution of the merits of the stay motion. At this Court's direction, the government provided the 63 documents for the Court's *in camera* review. Briefing for the stay motion was complete on July 25. On July 26, this Court *sua sponte*

ordered Treasury to explain "on what basis the Department of the Treasury is asserting the presidential communications privilege." Order of July 26, 2017. Treasury responded on August 1, explaining that the privilege is invoked on behalf of the Office of the President.

ARGUMENT

"A party bears a heavy burden of showing that summary disposition is appropriate." *Sills v. Bureau of Prisons,* 761 F.2d 792, 794 (D.C. Cir. 1985) (citing *United States v. Allen,* 408 F.2d 1287, 1288 (D.C. Cir. 1969) (per curiam)). To grant a party summary disposition, "this court must conclude that no benefit will be gained from further briefing and argument of the issues presented." *Taxpayers Watchdog, Inc. v. Stanley,* 819 F.2d 294, 298 (D.C. Cir. 1987) (per curiam). And "a party who seeks summary disposition of an appeal must demonstrate that the merits of his claim are so clear as to justify expedited action." *Walker v. Washington*, 627 F.2d 541, 546 (D.C. Cir. 1980).

Respondents have failed to meet this burden. Rather than demonstrating that the district court's decision is clearly correct, respondents' motion for summary disposition only underscores the errors of that decision. Respondents' motion should be denied.

I. Respondents Have Failed to Demonstrate That This Court Lacks Jurisdiction to Review the District Court's Order, Let Alone That the Issue Is Clear Enough to Warrant Summary Disposition.

Although respondents urge that this Court cannot review the district court's order on appeal or in the exercise of its mandamus powers, that contention is without merit.

A. The district court's disclosure order is a final order appealable under 28 U.S.C. § 1291. The Supreme Court has explained that a "final order" is one "by which a district court disassociates itself from a case." *Gelboim v. Bank of America Corp.*, 135 S. Ct. 897, 902 (2015) (quoting *Swint v. Chambers Cty. Comm'n,* 514 U.S. 35, 42 (1995)). That is the case here. The district court's final decision adjudicated the only disputes before that court. The underlying litigation takes place in a different circuit: the sole issue before this district court was whether and to what extent Treasury should be required to disclose documents to respondents. The district court's disclosure order fully resolved that issue. Such orders directed at third parties in proceedings outside of the circuit of the underlying litigation are "final decisions" subject to appeal under section 1291. *See Linder v. Department of Defense*, 133 F.3d 17, 22-24 (D.C. Cir. 1998); 28 U.S.C. § 1291.

Respondents fail entirely to grapple with the language of 28 U.S.C. § 1291 and the Supreme Court's guidance on its meaning. Respondents offer no explanation of why such orders are not "final," and indeed recognize that courts have held that third-party subpoena rulings are final orders "when issued by a district court in an ancillary

proceeding, and said district court is not within the jurisdiction of the circuit court." Mot. 7-8 (quoting *Sik Gaek, Inc. v. Harris*, 789 F.3d 797, 799-800 (7th Cir. 2015)).

Respondents instead attempt to rely on a distinction some courts outside this Circuit have drawn between orders granting and denying discovery. Mot. 8. But those courts similarly failed to grapple with the plain text of section 1291 and the question whether the district court had "disassociate[d] itself from [the] case." *Gelboim*, 135 S. Ct. at 902. And their discussions of the finality of orders granting discovery against a third party in a different circuit are largely dicta.

Respondents are similarly mistaken in urging that the order is not final because the district court's initial disclosure order contemplated possible future redactions, and the district court's later denial of a stay instructed the parties to negotiate a protective order. Mot. 8-9. "[T]he fact that the district court may retain jurisdiction over the parties to enforce its judgment does not convert the judgment to an interlocutory order." *Tyler v. City of Manhattan,* 118 F.3d 1400, 1402 n.1 (10th Cir. 1997). "An order or judgment is final for purposes of appeal if it resolves all substantive issues on the merits and effectively ends the litigation." *Ibid.* The substantive issues have been decided in this case: Treasury has been ordered to disclose 63 documents that the district court acknowledged were protected by the presidential communications privilege.

B. Even assuming that the order concluding these proceedings were not an otherwise appealable final order, it would be reviewable under the collateral order

doctrine, which gives finality a "practical rather than a technical construction." *Mohawk Indus., Inc. v. Carpenter*, 558 U.S. 100, 106 (2009) (quotation marks and citation omitted).

Respondents urge that collateral order review is not available here because, in their view, the decision is not "effectively unreviewable on appeal from a final judgment." Mot. 9 (quoting *Coopers & Lybrand v. Livesay*, 437 U.S. 463, 468 (1978)).[2] In making this argument, respondents distort the customary understanding of what it means for an order to be effectively reviewable on final judgment. Respondents do not deny that Treasury cannot seek review from a final judgment in the Michigan case (as Treasury is not a party), and respondents do not claim that there will be a later final judgment in *this* case. Instead, respondents urge that Treasury could manufacture

[2] Respondents do not contend in their motion that the order at issue here fails to meet the other requirements of the collateral order doctrine. The Supreme Court reserved the question of whether the doctrine would apply to the presidential communications privilege, *Mohawk*, 558 U .S. at 113 n.4, but it is clear that orders to produce presidential communications fall within the "narrow class of decisions" that "are sufficiently important and collateral to the merits that they should . . . be treated as final," *Will v. Hallock*, 546 U.S. 345, 347 (2006); *see Al Odah v. United States*, 559 F.3d 539, 543 (D.C. Cir. 2009) (applying collateral order review in case involving disclosure of classified documents); *cf. Perry v. Schwarzenegger*, 591 F.3d 1147, 1155-56 (9th Cir. 2010) (explaining that the strong interest in preserving First Amendment privilege renders collateral order a "close question," but granting mandamus without deciding the issue). An order to disclose documents acknowledged to be within the scope of the presidential communications privilege implicates several "value[s] of a high order"—"honoring the separation of powers" and "preserving the efficiency of government and the initiative of its officials." *Will*, 546 U.S. at 352; *see United States v. Nixon,* 418 U.S. 683, 708 (1974). And where, as here, the privilege is invoked by an entity that is not even a party to the underlying litigation, there is no risk of piecemeal appeals or other strategic litigation choices. *Cf. Mohawk*, 558 U.S. at 106, 108.

an appealable order by willfully disobeying the district court's order so as to incur a contempt ruling, which would be treated as appealable because Treasury is not a party to the underlying litigation. Mot. 9.

But a contempt ruling is not the kind of final judgment that the Supreme Court had in mind in *Coopers & Lybrand*, which concerned an order denying class certification that would indisputably merge into a final judgment and be capable of challenge by plaintiffs or intervening class members after final judgment was entered. 437 U.S. at 469. The same is true of the discovery ruling in *Mohawk*, which was directed at a party and would therefore merge into a final judgment subject to appeal. *Mohawk*, 558 U.S. at 108 (question is whether "deferring review until final judgment" is appropriate). The issue in this case is not whether the court should "defer[] review until final judgment," *ibid.*; because Treasury is not a party to the underlying litigation, it will never be in a position to appeal the final judgment in the Michigan proceedings. The disclosure order is thus "effectively unreviewable on appeal from a final judgment." *Coopers & Lybrand*, 437 U.S. at 468.

C. Respondents are on equally unfirm ground in urging that the Court cannot properly exercise its mandamus authority because Treasury should, instead, incur a contempt ruling. As the Supreme Court has explained, "special considerations control when the Executive Branch's interests in maintaining the autonomy of its office and safeguarding the confidentiality of its communications are implicated." *Cheney v. U.S. Dist. Court*, 542 U.S. 367, 385 (2004). As was the case in *Cheney*, the privilege at issue in

this case "remove[s] this case from the category of ordinary discovery orders where interlocutory appellate review is unavailable, through mandamus or otherwise." *Id.* at 381.

Respondents do not suggest that the Court would properly require the Office of the President to incur a contempt sanction in order to vindicate an assertion of the presidential communications privilege. *Cf. United States v. Nixon,* 418 U.S. 683, 691 (1974). And it would be no more appropriate to require Treasury officials to willfully disobey a court order, incur contempt, and violate their duty to faithfully execute the laws in order to protect a privilege held by the Office of the President. *See In re Sealed Case*, 148 F.3d 1073, 1074 (D.C. Cir. 1998); *In re F.D.I.C.*, 58 F.3d 1055, 1060 n.7 (5th Cir. 1995) (granting mandamus and noting inappropriateness of forcing federal officials to incur contempt to get review of discovery order); *see also In re United States*, 678 F. App'x 981, 988-89 (Fed. Cir. Jan. 30, 2017) (issuing writ of mandamus to correct trial court's erroneous analysis of the presidential communications privilege); *Mohawk*, 558 U.S. at 111-12 (presenting mandamus and contempt as two alternative courses to appellate review).

Respondents rely heavily on *In re Kessler*, 100 F.3d 1015 (D.C. Cir. 1996), in which the Court declined to issue a writ of mandamus to preclude the deposition of the Commissioner of the Food and Drug Administration. The case did not involve the assertion of any privilege, let alone the presidential communications privilege. *See id.* at 1017 n.2. Insofar as cases involving the testimony of high-ranking officials bear

on the availability of mandamus here, more relevant guidance is provided by *In re Cheney*, 544 F.3d 311 (D.C. Cir. 2008), in which this Court issued a writ to preclude the deposition of the Vice President's chief of staff, which, the Court explained, "would constitute an 'unwarranted impairment' of the functioning of [the Office of the Vice President]." *Id.* at 314.

* * *

For these reasons, this Court has the power to correct the district court's clear error—whether by final judgment, collateral order, or mandamus—and respondents have certainly failed to demonstrate that the contrary is so clear as to warrant summary disposition.

II. The District Court's Decision Reflects Clear and Significant Error, and Certainly Does Not Warrant Summary Affirmance.

As discussed in greater detail in our motion for a stay and our reply, the district court committed clear error in its application of this Court's precedent governing the presidential communications privilege. The order applied the wrong legal standard and failed to engage in the analysis required by the test it purported to apply.

A. To overcome a proper assertion of the privilege even in a criminal case, a party must demonstrate that the privileged presidential communications it seeks are likely to contain evidence "directly relevant to issues that are expected to be central to the trial"—a standard that excludes materials that are "only tangentially relevant or would relate to side issues." *In re Sealed Case*, 121 F.3d 729, 754 (D.C. Cir. 1997). The

party must also show that the information sought "is not available with due diligence elsewhere." *Id.* at 754. That is, the party must show that, notwithstanding other sources of information, the privileged documents are "still needed." *Id.* at 755 (explaining that this standard reflects the Supreme Court's "insistence that privileged presidential communications should not be treated as just another source of information"). And, as explained in our motion for stay, this case requires the even more stringent standard applicable when the privilege is asserted in an ordinary civil case and does not implicate "the public interest in assuring fair trials and enforcing the law" present in criminal cases. *Id.* at 753.

B. Respondents' motion for summary disposition offers no basis on which the district court's order could properly be upheld.

Although the district court declared that the relevant standard is that articulated in *In re Sealed Case,* the court invoked the very different standard set out in *Dellums v. Powell*, 561 F.2d 242, 249 (D.C. Cir. 1977), in concluding that respondents had met their burden, stating that they had "made 'at least a preliminary showing of necessity for information that is not merely demonstrably relevant but indeed substantially material to their case.'" Dkt. No. 45, at 11 (Add. 27).

Respondents attempt to sidestep this error by suggesting that the *In re Sealed Case* standard is essentially the same as the standard (Mot. 14) articulated in *Dellums*. In *Dellums*, however, it was of "cardinal significance" that the privilege was asserted only by a former President who had left office, and the government was not supporting

that assertion. *Dellums*, 561 F.2d at 244-49. This case involves not a "diminished" standard applicable to assertions by former Presidents (assuming for the sake of argument, as this Court did, that such assertions are cognizable), but requires the even more stringent standard applicable when the privilege is asserted in an ordinary civil case. Respondents likewise all but disregard the Supreme Court's admonition in *Cheney*, 542 U.S. at 383-84 (2004), that "civil proceedings" do not present the same "urgency" and "constitutional dimensions" that might otherwise warrant overriding executive privilege in response to criminal subpoena requests. Summary affirmance is manifestly inappropriate when a district court applies the wrong legal standard.

In any event, the district court's perfunctory analysis fails under any standard. Respondents merely contend, without support, that the opinion was "detailed and thorough." Mot. 12. But respondents' assertion that the district court spent "seven pages" detailing how the documents were "highly relevant" to respondents' claims in the underlying litigation does not withstand even the briefest scrutiny. Mot. 17. The pages to which respondents refer consist of the district court detailing the reasons why the documents *are protected by the presidential communications privilege*—not whether the respondents made the required showing to overcome the privilege. *See* Dkt. No. 45, at 5-12 (Add. 21-28). On that issue, the district court's discussion was limited to one sentence summarily stating, "Respondents have made 'at least a preliminary showing of necessity for information that is not merely demonstrably relevant but indeed substantially material to their case.'" Dkt. No. 45, at 11 (Add. 27). As explained

in our motion for a stay and our reply, this analysis wholly failed to satisfy the requirements established by this Court.

Inasmuch as respondents do not establish that the requested documents are likely to contain important evidence that bears directly on their central claim against the PBGC, it is unsurprising that they cannot explain why the 63 documents are a unique source of such information. The district court—despite having full access *in camera* to the privileged documents—uncritically credited respondents' assertion that "the materials are unavailable through any other means." Dkt. No. 45, at 11 (Add. 27). But the question is not whether the very same documents are otherwise available; the question is whether the presidential communications at issue would add new, important, relevant information not available elsewhere. *See, e.g.*, *Sealed Case*, 121 F.3d at 755, 757.

Respondents do not come to grips with this question. Instead they contend that the district court adequately explained why the requested materials remained necessary notwithstanding other available evidence. Mot. 15, 18. In particular, respondents point to the district court's denial of the government's first motion to quash. Mot. 18 n.2. But that denial does not excuse respondents and the district court from meeting their burden to explain why these 63 privileged documents remained necessary in light of the other information available to respondents (especially after disclosure of thousands of pages of additional documents by Treasury in January 2017).

In sum, the district court committed clear error. As we explained in our stay papers, respondents are not likely to succeed in this appeal and still less have they demonstrated an entitlement to summary affirmance.

CONCLUSION

For the foregoing reasons, the Court should deny respondents' motion for summary disposition.

Respectfully submitted,

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AUGUST 2017

CERTIFICATE OF COMPLIANCE WITH FEDERAL RULE OF APPELLATE PROCEDURE 27(d)

I hereby certify that this motion complies with Federal Rule of Appellate Procedure 27(d)(1) because it has been prepared in 14-point Garamond, a proportionally spaced font. I further certify that it complies with Federal Rule of Appellate Procedure 27(d)(2) because it contains 4,361 words according to the count of Microsoft Word.

/s/ Abby C. Wright
Abby C. Wright

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2017, I electronically filed the foregoing with the Clerk of the Court by using the appellate CM/ECF system. Service will be accomplished by the appellate CM/ECF system.

s/ Abby C. Wright
ABBY C. WRIGHT