

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

JOSEPH KIRCHNER,

*Plaintiff,*

v.

MIKE JOHNSON, in his individual and official  
capacity as Speaker of the United States House of  
Representatives;  
DONALD J. TRUMP, in his individual capacity as  
former and current President of the United States;  
PAMELA J. BONDI, in her individual and official  
capacity as Attorney General of the United States;  
BRENDAN T. CARR, in his individual and  
official capacity as Chairman of the Federal  
Communications Commission;  
THE UNITED STATES HOUSE OF  
REPRESENTATIVES;  
ANTHROPIC PBC;  
OPENAI, INC.;  
APPLE INC.;  
COMCAST CABLE COMMUNICATIONS, LLC;  
METR (MODEL EVALUATION & THREAT  
RESEARCH);  
and DOES 1-20, unknown co-conspirators,  
*Defendants.*

Case No. 1:25-cv-02735-ACR

NOTICE OF ERRATA —  
DISCOVERY CORRELATION  
MATRIX

Plaintiff Joseph Kirchner, *pro se*, files this Notice of Errata to the Renewed Emergency Motion for Expedited Discovery and Immediate Preservation Order (ECF No. 55) (the "Discovery Motion") to correct two clerical issues:

**Inadvertent omission.** The Discovery Correlation Matrix referenced at ¶ 51 of the Discovery Motion and listed in its Certificate of Service was inadvertently omitted from the May 5, 2026 CM/ECF transmission. Plaintiff files the Matrix as **Exhibit 1** hereto, prepared as of May 5, 2026, and incorporates it into the operative record of the Discovery Motion.

**Corrected designation.** The Discovery Motion and its Certificate of Service refer to the document as the "SMF–Discovery Correlation Matrix." To avoid confusion with summary-

judgment Statements of Material Facts under Federal Rule of Civil Procedure 56 and Local Civil Rule 7(h), the document is correctly designated **Discovery Correlation Matrix**, as titled on Exhibit 1 hereto.

The Matrix is corroborating reference material mapping each substantive discovery request to its evidentiary predicate in the Third Amended Complaint, the supporting memorandum or appendix, and the exhibit findings each request targets. It imposes no obligation on any Defendant, introduces no new request or evidentiary predicate, and does not modify the relief requested or response timelines in the Discovery Motion. No Defendant is prejudiced by the two-day delay between the May 5, 2026 filing of the Discovery Motion and the lodging of the Matrix herewith.

Respectfully submitted,

/s/ Joseph Kirchner

**JOSEPH KIRCHNER**

*Pro Se Plaintiff*

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Email: legal@lawsofexistence.com

**Dated:** May 7, 2026

### **CERTIFICATE OF SERVICE**

I hereby certify that on **May 7, 2026**, I filed the foregoing **NOTICE OF ERRATA — DISCOVERY CORRELATION MATRIX**, together with the **Discovery Correlation Matrix** lodged as Exhibit 1 hereto, via the Court's CM/ECF electronic filing system, which served counsel of record listed below; and that I will cause the foregoing to be served by certified mail, return receipt requested, upon the non-appearing Defendants and the United States listed below same day or on the next business day.

*Counsel of record served via the Court's CM/ECF electronic filing system on May 7, 2026:*

Danny C. Onorato  
Tara Tighe  
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*Counsel for Defendant OpenAI, Inc.*

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*Counsel for Defendant Apple Inc.*

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*Counsel for Defendant Comcast Cable Communications, LLC*

*Defendants without counsel of record, to be served by certified mail, return receipt requested, same day or on the next business day:*

Mike Johnson  
Speaker, U.S. House of Representatives  
Office of the Speaker  
U.S. Capitol Building H-232  
Washington, DC 20515

Donald J. Trump  
President of the United States  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

Pamela J. Bondi  
Attorney General of the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue NW  
Washington, DC 20530

Brendan T. Carr  
Chairman, Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

United States House of Representatives  
c/o Office of the General Counsel  
219 Cannon House Office Building  
Washington, DC 20515

Model Evaluation and Threat Research, Inc. (METR)  
c/o Tovella Dowling PC  
501 W Broadway, Suite 1540  
San Diego, CA 92101

*Federal service per Federal Rule of Civil Procedure 4(i)(1), to be served by certified mail, return receipt requested, same day or on the next business day:*

Civil Process Clerk  
U.S. Attorney's Office for the District of Columbia  
601 D Street NW  
Washington, DC 20530

Attorney General of the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue NW  
Washington, DC 20530

**Dated:** May 7, 2026

/s/ Joseph Kirchner  
**JOSEPH KIRCHNER**  
*Pro Se Plaintiff*