

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

UNITED STATES OF AMERICA	:	
	:	
	:	No. 23-cr-257-TSC
	:	
v.	:	
	:	
DONALD J. TRUMP,	:	
	:	
Defendant.	:	
	:	

**MOTION TO REVISE BRIEFING SCHEDULE AND SET ORAL ARGUMENT
REGARDING GOVERNMENT’S MOTION FOR PROTECTIVE ORDER**

At approximately 6:00 PM on Friday evening, the government e-mailed defense counsel its proposed protective order (Doc. 10-1, the “Proposed Order”). Ex. A (Correspondence). The government entertained no discussion regarding the content or scope of the Proposed Order, but instead demanded an immediate, take-it-or-leave-it response. Hours later, the government filed its motion, Doc. 10 (the “Motion”), requesting the Court adopt the Proposed Order without awaiting Defendant’s responsive briefing, contrary to LCrR 47 and bedrock due process principles. *Cf. Application of Storer Commc’ns, Inc.*, 828 F.2d 330, 335 (6th Cir. 1987) (“*Ex parte* proceedings, particularly in criminal cases, are contrary to the most basic concepts of American justice and should not be permitted except possibly in most extraordinary cases involving national security.”).

This morning, the Court entered a minute order, directing Defendant to respond by August 7, 5:00 PM. To ensure counsel has adequate time to prepare a fulsome response, Defendant respectfully requests the Court briefly extend this schedule by three days to permit Defendant’s response by August 10, 2023. This is substantially less time than provided for by LCrR 47 (generally allowing 14 days to respond to motions) and will enable Defendant to fully assess the Proposed Order and advise the Court of applicable law.

Additionally, a brief extension would provide time for the parties to meaningfully confer—and potentially resolve—this dispute without Court intervention. Without doubt, discovery in this case will be extensive and likely present numerous complex issues. For that reason, it is essential to structure the parties’ discussions in a methodical and, ideally, cooperative manner. Friday evening ultimatums, given by the government before even calling defense counsel, are wholly unproductive and undermine the potential for party-driven resolutions. Requiring a Monday response to a Friday evening motion likewise forecloses the possibility of agreement and would encourage such improper tactics by the government in the future.¹

Defendant is prepared to confer in good faith regarding an appropriate protective order and hopes the government will accept his invitation to do so. In the meantime, an additional three days to brief this important issue is reasonable, consistent with the Local Rules, and serves the interests of justice. No party would be prejudiced by the requested relief, as this case is at its very early stages and no matters are currently pending that require the immediate resolution of the Motion.

Finally, should the parties be unable to agree on an appropriate protective order, Defendant believes a hearing would be beneficial to the Court’s determination of the Motion, which involves significant legal, factual, and procedural issues that can be most efficiently presented and resolved in an oral setting. As such, Defendant respectfully requests the Court set a hearing on the Motion for the first available date following the conclusion of briefing.²

¹ Indeed, the government’s lack of conferral represents a concerning pattern. Just three weeks ago, In *United States v. Donald J. Trump*, 9:23-cr-80101-AMC (SDFL) (Docket Attached as Ex. B), the government made a similar demand for a Friday night response to a proposed protective order, followed by a near-immediate motion for relief. Ex. B at ECF #79. The Court admonished this recalcitrant approach and denied the government’s motion “without prejudice for lack of meaningful conferral.” *Id.* at ECF #82. That the government would use the same tactic, so soon after, is plainly improper.

² As explained above, as a general matter, we think it is important to confer prior to the filing of any motion. However, given the circumstances presented here—where Defendant has been

Dated: August 5, 2023

Respectfully submitted,

Todd Blanche, Esq. (PHV *Pending*)
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/s/John F. Lauro
John F. Lauro, Esq.
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Counsel for President Donald J. Trump

ordered on a weekend to respond by Monday afternoon—we determined it necessary to submit our proposed briefing schedule as soon as possible to obtain clarity regarding Defendant’s obligations. Consequently, we have not conferred with the government regarding this application.

Exhibit A

[REDACTED]

From: [REDACTED]
Sent: Friday, August 4, 2023 6:39 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: proposed protective order
Attachments: 2023.08.04 Protective Order.pdf

Thanks for email but suggesting a meet and confer at 6 pm on a Friday is not realistic. We will suggest to the Magistrate Judge that we will need to brief these issues and request oral argument as well. Please note in your papers that we did not have adequate time to confer. Thanks and have a good weekend.

On Aug 4, 2023, at 6:06 PM, [REDACTED] wrote:

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks, John. We reviewed this and are concerned that it would leave large amounts of material completely unprotected in a way not contemplated by standard orders in the District of Columbia. In order to try to reach agreement, we have drafted the attached, which is modeled on a protective order recently used in a criminal case before Judge Nichols. Please let us know whether we can represent that you consent to it. We are going to file this evening in the interest of getting you discovery as soon as possible.

From: [REDACTED]
Sent: Friday, August 4, 2023 2:45 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Re: proposed protective order

Hi Thomas - we took this order form similar orders used in the District. The case in Florida of course is a classified documents case, which is not what we have here. We would be happy to address this with the Court by submitting separate proposed orders and letting the Court decide, but not sure why we need to have a special/more restricted protocol here.

On Aug 4, 2023, at 2:39 PM, [REDACTED] wrote:

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Thanks. John, this is very different from what we proposed (which was, essentially, what was agreed to in Florida). We are interested in reaching an agreement on this, but

do not believe it makes sense—at this point at least—to go through sensitive/non-sensitive designations. If you can agree to that, we'll work on a blend of the two documents and send back a proposal.

From: [REDACTED]
Sent: Friday, August 4, 2023 1:09 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] RE: proposed protective order

All—John asked me to send you the defense's proposed protective order. Please see attached.

Thank you.

Filzah I. Pavalon
Of Counsel | Admitted FL & IL
fpavalon@laurosinger.com

Tampa [REDACTED]
T [REDACTED]
Miami [REDACTED]
New York [REDACTED]
laurosinger.com

<image001.png>

#

IMPORTANT: The contents of this email and any attachments are confidential. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

#

Begin forwarded message:

From: [REDACTED]
Date: August 2, 2023 at 9:55:06 PM EDT
To: [REDACTED]
Cc: "MGG (JSPT)" [REDACTED] "TPW (JSPT)" [REDACTED]
Subject: proposed protective order

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

John and Todd –

Attached please find a proposed protective order. You will notice that it largely tracks the existing protective order in SDFL. Please let us know if

you have any comments. Ideally we could get this on file Thursday, if you are in agreement with it.

Thanks
tw

Exhibit B

BER,BNDDUTY,BNDEGT,REF_EVENTS ONLY (NEFs)

U.S. District Court
Southern District of Florida (West Palm Beach)
CRIMINAL DOCKET FOR CASE #: 9:23-cr-80101-AMC All Defendants

Case title: USA v. Trump, et al.

Date Filed: 06/08/2023

Assigned to: Judge Aileen M. Cannon
Referred to: Magistrate Judge Bruce E.
Reinhart

Defendant (1)

Donald J. Trump
63675-510
YOB: 1946; English

represented by **Christopher Michael Kise**
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PRO HAC VICE
ATTORNEY TO BE NOTICED
Designation: Retained

Pending Counts

WILLFUL RETENTION OF
NATIONAL DEFENSE
INFORMATION/18:793.F
(1-31)

WILLFUL RETENTION OF
NATIONAL DEFENSE
INFORMATION 18:793.F
(1s-32s)

CONSPIRACY TO OBSTRUCT
JUSTICE/18:1512K.F
(32)

WITHHOLDING A DOCUMENT OR
RECORD/18:1512B.F
(33)

Disposition

CONSPIRACY TO OBSTRUCT
JUSTICE 18:1512K.F
(33s)

CORRUPTLY CONCEALING A
DOCUMENT OR
RECORD/18:1512C.F
(34)

WITHHOLDING A DOCUMENT OR
RECORD 18:1512B.F
(34s)

CONCEALING A DOCUMENT IN A
FEDERAL
INVESTIGATION/18:1519.F
(35)

CORRUPTLY CONCEALING A
DOCUMENT OR RECORD
18:1512C.F
(35s)

SCHEME TO CONCEAL/18:1001.F
(36)

CONCEALING A DOCUMENT IN A
FEDERAL INVESTIGATION
18:1519.F
(36s)

FALSE STATEMENTS AND
REPRESENTATIONS/18:1001.F
(37)

SCHEME TO CONCEAL 18:1001.F
(37s)

FALSE STATEMENTS AND
REPRESENTATIONS 18:1001.F
(38s)

ALTERING, DESTROYING,
MUTILATING, OR CONCEALING
AN OBJECT 18:1512B.F
(40s)

CORRUPTLY ALTERING,
DESTROYING, MUTILATING OR
CONCEALING A DOCUMENT,
RECORD, OR OTHER OBJECT
18:1512C.F
(41s)

Highest Offense Level (Opening)

Felony

Terminated Counts

None

Disposition

Highest Offense Level (Terminated)

None

Complaints

None

Disposition

Assigned to: Judge Aileen M. Cannon
Referred to: Magistrate Judge Bruce E.
Reinhart

Defendant (2)

Waltine Nauta
63672-510
YOB: 1983; English

represented by **Sasha Dadan**
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ATTORNEY TO BE NOTICED
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Pending Counts

CONSPIRACY TO OBSTRUCT
JUSTICE/18:1512K.F
(32)

WITHHOLDING A DOCUMENT OR
RECORD/18:1512B.F
(33)

CONSPIRACY TO OBSTRUCT
JUSTICE 18:1512K.F
(33s)

CORRUPTLY CONCEALING A
DOCUMENT OR
RECORD/18:1512C.F
(34)

WITHHOLDING A DOCUMENT OR
RECORD 18:1512B.F
(34s)

CONCEALING A DOCUMENT IN A
FEDERAL
INVESTIGATION/18:1519.F
(35)

CORRUPTLY CONCEALING A
DOCUMENT OR RECORD
18:1512C.F
(35s)

SCHEME TO CONCEAL/18:1001.F
(36)

CONCEALING A DOCUMENT IN A
FEDERAL INVESTIGATION
18:1519.F
(36s)

Disposition

SCHEME TO CONCEAL 18:1001.F
(37s)

FALSE STATEMENTS AND
REPRESENTATIONS/18:1001.F
(38)

FALSE STATEMENTS AND
REPRESENTATIONS 18:1001.F
(39s)

ALTERING, DESTROYING,
MUTILATING, OR CONCEALING
AN OBJECT 18:1512B.F
(40s)

CORRUPTLY ALTERING,
DESTROYING, MUTILATING OR
CONCEALING A DOCUMENT,
RECORD, OR OTHER OBJECT
18:1512C.F
(41s)

Highest Offense Level (Opening)

Felony

Terminated Counts

Disposition

None

Highest Offense Level (Terminated)

None

Complaints

Disposition

None

Assigned to: Judge Aileen M. Cannon
Referred to: Magistrate Judge Bruce E.
Reinhart

Defendant (3)

Carlos De Oliveira
70743-510
YOB 1966; ENGLISH

Pending Counts

Disposition

CONSPIRACY TO OBSTRUCT
JUSTICE 18:1512K.F
(33s)

ALTERING, DESTROYING,
MUTILATING, OR CONCEALING AN
OBJECT 18:1512B.F
(40s)

CORRUPTLY ALTERING,
DESTROYING, MUTILATING OR
CONCEALING A DOCUMENT,
RECORD, OR OTHER OBJECT
18:1512C.F
(41s)

FALSE STATEMENTS AND
REPRESENTATIONS 18:1001.F
(42s)

Highest Offense Level (Opening)

Felony

Terminated Counts

None

Disposition

Highest Offense Level (Terminated)

None

Complaints

None

Disposition

Plaintiff

USA

represented by **Jay I. Bratt**
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950 Pennsylvania Avenue, NW
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US Attorney's Office, Southern District of
Florida
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ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
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06/08/2023	<u>1</u>	MOTION to seal by USA as to Donald J. Trump, Waltine Nauta. (sl) (Entered: 06/08/2023)
06/08/2023	<u>2</u>	ORDER granting <u>1</u> Motion to seal as to Donald J. Trump (1), Waltine Nauta (2). Signed by Ch. Magistrate Judge Edwin G. Torres on 6/8/2023. <i>See attached document for full details.</i> (sl) (Entered: 06/08/2023)
06/08/2023	<u>3</u>	INDICTMENT as to Donald J. Trump (1) count(s) 1–31, 32, 33, 34, 35, 36, 37, Waltine Nauta (2) count(s) 32, 33, 34, 35, 36, 38. (sl) (Additional attachment(s) added on 6/8/2023: # <u>1</u> Restricted Unredacted Indictment) (sl). (Entered: 06/08/2023)
06/08/2023	<u>4</u>	Criminal Summons Issued in case as to Donald J. Trump. Documents contained herein are restricted from public viewing pursuant to the Judicial Conference Policy on Privacy and Public Access to Electronic Case Files. Initial Appearance set for 6/13/2023 03:00 PM in Miami Division (Courtroom 13–3 Wilkie D. Ferguson Building) before MIA Duty Magistrate Judge. (sl) (Entered: 06/08/2023)
06/08/2023	<u>5</u>	Criminal Summons Issued in case as to Waltine Nauta. Documents contained herein are restricted from public viewing pursuant to the Judicial Conference Policy on Privacy and Public Access to Electronic Case Files. Initial Appearance set for 6/13/2023 03:00 PM in Miami Division (Courtroom 13–3 Wilkie D. Ferguson Building) before MIA Duty Magistrate Judge. (sl) (Entered: 06/08/2023)
06/09/2023	<u>6</u>	MOTION to Unseal by USA as to Donald J. Trump, Waltine Nauta. (sl) (Entered: 06/09/2023)
06/09/2023	<u>7</u>	ORDER UNSEALING CASE, Granting <u>6</u> Motion to Unseal as to Donald J. Trump (1), Waltine Nauta (2). Signed by Ch. Magistrate Judge Edwin G. Torres on 6/9/2023. <i>See attached document for full details.</i> (sl) (Entered: 06/09/2023)
06/09/2023	<u>8</u>	Press Motion to Intervene and Unseal The Indictment of Former President Donald Trump by WP Company LLC, TEGNA Inc., Reuters News & Media Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Publisher of The Los Angeles Times, Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Publisher of The Wall Street Journal, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc., CMG Media Corporation as to Donald J. Trump. (drz) (Entered: 06/12/2023)
06/12/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Charles David Tobin, Chad R. Bowman, Maxwell S. Mishkin, Lauren Russell for WP Company LLC, TEGNA Inc., Reuters News & Media Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Charles David Tobin, Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc. added (sk) (Entered: 06/12/2023)
06/12/2023	<u>9</u>	Bar Letter re: Admissions sent to attorneys Chad R. Bowman, Maxwell S. Mishkin, Lauren Russell and Todd Blanche, mailing date June 12, 2023, as to Donald J. Trump, Waltine Nauta. (cw) (Entered: 06/12/2023)
06/12/2023	<u>10</u>	MOTION for (1) pre-hearing photography and videorecording and (2) release of courtroom audio recording by WP Company LLC, TEGNA Inc., Reuters News & Media Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc., CMG Media Corporation as to Donald J. Trump, Waltine Nauta. Responses due by 6/26/2023 (Tobin, Charles) (Entered: 06/12/2023)
06/12/2023	<u>11</u>	ORDER ON "PRESS COALITION" MOTION. Signed by Magistrate Judge Jonathan Goodman on 6/12/2023. <i>See attached document for full details.</i> (mkr) (Entered: 06/12/2023)

06/13/2023	<u>12</u>	PAPERLESS ORDER denying as moot <u>8</u> Press Motion to Intervene and Unseal the Indictment of Former President Donald Trump. Movants seek to intervene for the "limited purpose of seeking an order promptly unsealing [the] indictment" <u>8</u> . By prior Order, the Court already unsealed the indictment <u>7</u> . Thus, the Press Motion to Intervene and Unseal is moot. Signed by Judge Aileen M. Cannon on 6/13/2023. (sj00) Modified on 6/13/2023 (tci). (Entered: 06/13/2023)
06/13/2023	<u>13</u>	NOTICE OF ATTORNEY APPEARANCE: Christopher Michael Kise appearing for Donald J. Trump . Attorney Christopher Michael Kise added to party Donald J. Trump(pty:dft). (Kise, Christopher) (Entered: 06/13/2023)
06/13/2023	<u>14</u>	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Todd Blanche. Filing Fee \$ 200.00. Receipt # AFLSDC-16688222 by Donald J. Trump. Responses due by 6/27/2023 (Attachments: # <u>1</u> Certification, # <u>2</u> Text of Proposed Order)(Kise, Christopher) (Entered: 06/13/2023)
06/13/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Todd Blanche for Donald J. Trump added (pt) (Entered: 06/13/2023)
06/13/2023	<u>15</u>	PAPERLESS ORDER granting <u>14</u> Motion to Appear <i>Pro Hac Vice</i> , Consent to Designation, and Requests to Electronically Receive Notices of Electronic Filings for Attorney Todd Blanche. The Court reserves the power to withdraw permission for special appearance at any time. Failure to abide by any court order or failure to appear at any scheduled matter may result in immediate revocation of counsel's <i>pro hac vice</i> status. Local counsel must be ready to adequately represent the party at any time. Signed by Judge Aileen M. Cannon on 6/13/2023. (sj00) (Entered: 06/13/2023)
06/13/2023		Arrest of Donald J. Trump (mdc) (Entered: 06/14/2023)
06/13/2023	<u>16</u>	Minute Order for proceedings held before Magistrate Judge Jonathan Goodman: Initial Appearance and ARRAIGNMENT as to Donald J. Trump (1) Count 1-31,32,33,34,35,36,37 held on 6/13/2023. Todd Blanche, pro hac vice and Christopher Kise appeared as PERMANENT Counsel of Record. Bond set: Donald J. Trump (1) Personal Recognizance. <i>See document for full details.</i> Court Reporter: Stephanie McCarn, 305-523-5518 / Stephanie_McCarn@flsd.uscourts.gov. It is ORDERED AND ADJUDGED that pursuant to the Due Process Protections Act, the Court confirms the United States obligation to disclose to the defendant all exculpatory evidence- that is, evidence that favors the defendant or casts doubt on the United States case, as required by <i>Brady v. Maryland</i> , 373 U.S. 83 (1963) and its progeny, and ORDERS the United States to do so. The government has a duty to disclose any evidence that goes to negating the defendants guilt, the credibility of a witness, or that would reduce a potential sentence. The defendant is entitled to this information without a request. Failure to disclose exculpatory evidence in a timely manner may result in consequences, including, but not limited to, exclusion of evidence, adverse jury instructions, dismissal of charges, contempt proceedings, disciplinary action, or sanctions by the Court. PAPERLESS STANDING DISCOVERY ORDER: The defendant(s) having been arraigned this date in open Court, it is Ordered that within 14 days of the date of this order that all parties to this action shall review and comply with Southern District of Florida Local Rules 88.10 (Criminal Discovery), and 88.9(c) (Motions in Criminal Cases). Upon a sufficient showing, the Court may at any time, upon a properly filed motion, order that the discovery or inspection provided for by this Standing Order be denied, restricted or deferred, or make such other order as is appropriate. It is expected by the Court, however, that counsel for both sides shall make a good faith effort to comply with the letter and spirit of this Standing Order. It shall be the continuing duty of counsel for both sides to immediately reveal to opposing counsel all newly discovered information or other material within the scope of Local Rule 88.10. Signed by Magistrate Judge Jonathan Goodman on 6/13/2023. (mdc) (Entered: 06/14/2023)
06/13/2023	<u>17</u>	Personal Recognizance Bond Entered as to Donald J. Trump Approved by Magistrate Judge Jonathan Goodman. <i>Please see bond image for conditions of release.</i> (mdc) (Additional attachment(s) added on 6/14/2023: # <u>1</u> Restricted Bond with 7th Page) (mdc). (Main Document 17 replaced on 6/14/2023) (mdc). (Attachment 1 replaced on 6/14/2023) (mdc). (Entered: 06/14/2023)

06/13/2023		Arrest of Waltine Nauta (mdc) (Entered: 06/14/2023)
06/13/2023	<u>18</u>	Minute Order for proceedings held before Magistrate Judge Jonathan Goodman: Initial Appearance as to Waltine Nauta held on 6/13/2023. Stanley Woodward appeared and is to file a Motion for Pro hac vice. Bond set: Waltine Nauta (2) Personal Recognizance. A Report Re: Counsel Hearing and Arraignment is set for 6/27/2023 at 09:45 AM in the Miami Division before Chief Magistrate Judge Edwin G. Torres, James Lawrence King Federal Justice Building, 99 NE 4th Street, 10th Floor – Courtroom 5, Miami, FL 33132. Court Reporter: Stephanie McCarn, 305-523-5518 / Stephanie_McCarn@flsd.uscourts.gov. It is ORDERED AND ADJUDGED that pursuant to the Due Process Protections Act, the Court confirms the United States obligation to disclose to the defendant all exculpatory evidence– that is, evidence that favors the defendant or casts doubt on the United States case, as required by <i>Brady v. Maryland</i> , 373 U.S. 83 (1963) and its progeny, and ORDERS the United States to do so. The government has a duty to disclose any evidence that goes to negating the defendants guilt, the credibility of a witness, or that would reduce a potential sentence. The defendant is entitled to this information without a request. Failure to disclose exculpatory evidence in a timely manner may result in consequences, including, but not limited to, exclusion of evidence, adverse jury instructions, dismissal of charges, contempt proceedings, disciplinary action, or sanctions by the Court. Signed by Magistrate Judge Jonathan Goodman on 6/13/2023. (mdc) (Entered: 06/14/2023)
06/13/2023	<u>19</u>	Personal Recognizance Bond Entered as to Waltine Nauta. Approved by Magistrate Judge Jonathan Goodman. <i>Please see bond image for conditions of release.</i> (mdc) (Additional attachment(s) added on 6/14/2023: # <u>1</u> Restricted Bond with 7th Page) (mdc). (Entered: 06/14/2023)
06/15/2023	<u>20</u>	PAPERLESS ORDER: On or before June 16, 2023 , all attorneys of record and forthcoming attorneys of record shall contact the Litigation Security Group of the U.S. Department of Justice, if they have not done so already, to expedite the necessary clearance process for all team members anticipated to participate in this matter, and thereafter file a Notice of Compliance no later than June 20, 2023 . Signed by Judge Aileen M. Cannon on 6/15/2023. (sj00) (Entered: 06/15/2023)
06/16/2023	<u>21</u>	NOTICE of Compliance by Donald J. Trump re 20 Order, (Kise, Christopher) (Entered: 06/16/2023)
06/16/2023	<u>22</u>	NOTICE OF ATTORNEY APPEARANCE Julie A. Edelstein appearing for USA. . Attorney Julie A. Edelstein added to party USA(pty:pla). (Edelstein, Julie) (Entered: 06/16/2023)
06/16/2023	<u>23</u>	MOTION for Protective Order by USA as to Donald J. Trump, Waltine Nauta. Responses due by 6/30/2023 (Attachments: # <u>1</u> Text of Proposed Order)(Bratt, Jay) (Entered: 06/16/2023)
06/16/2023	<u>24</u>	NOTICE OF ATTORNEY APPEARANCE Karen E. Gilbert appearing for USA. . Attorney Karen E. Gilbert added to party USA(pty:pla). (Gilbert, Karen) (Entered: 06/16/2023)
06/16/2023	<u>25</u>	PAPERLESS ORDER: Pursuant to 28 U.S.C. § 636 and the Magistrate Rules of the Local Rules of the Southern District of Florida, the Government's Motion for Protective Order <u>23</u> is hereby referred to Magistrate Judge Bruce E. Reinhart for appropriate disposition. Signed by Judge Aileen M. Cannon on 6/16/2023. (sj00) (Entered: 06/16/2023)
06/16/2023	<u>26</u>	NOTICE OF ATTORNEY APPEARANCE David Harbach appearing for USA. . Attorney David Harbach added to party USA(pty:pla). (Harbach, David) (Entered: 06/16/2023)
06/19/2023	<u>27</u>	ORDER granting <u>23</u> Unopposed Motion for Protective Order as to Donald J. Trump (1), Waltine Nauta (2). Signed by Magistrate Judge Bruce E. Reinhart <i>See attached document for full details.</i> (BER) (Entered: 06/19/2023)
06/20/2023	<u>28</u>	OMNIBUS ORDER SETTING TRIAL DATE AND ESTABLISHING PRETRIAL INSTRUCTIONS AND SENTENCING PROCEDURES as to Donald J. Trump. In Limine Motions due by 7/24/2023. Motions due by 7/24/2023. Calendar Call set for

		8/8/2023 01:45 PM in Fort Pierce Division before Judge Aileen M. Cannon. Jury Trial set for 8/14/2023 in Fort Pierce Division before Judge Aileen M. Cannon. Signed by Judge Aileen M. Cannon on 6/20/2023. <i>See attached document for full details.</i> (drz) <u>Pattern Jury Instruction Builder</u> – To access the latest, up to date changes to the 11th Circuit Pattern Jury Instructions go to https://pji.ca11.uscourts.gov or click here . (Entered: 06/20/2023)
06/21/2023	<u>29</u>	NOTICE OF ATTORNEY APPEARANCE Michael Thakur appearing for USA. . Attorney Michael Thakur added to party USA(pty:pla). (Thakur, Michael) (Entered: 06/21/2023)
06/21/2023	<u>30</u>	First RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta (Edelstein, Julie) (Entered: 06/21/2023)
06/22/2023	<u>31</u>	TRANSCRIPT of Initial Appearance and Arraignment as to Donald J. Trump, Waltine Nauta held on 06/13/23, before Magistrate Judge Jonathan Goodman, 1–36 pages, Court Reporter: Stephanie McCarn, 305–523–5518 / Stephanie_McCarn@flsd.uscourts.gov. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 7/13/2023. Redacted Transcript Deadline set for 7/24/2023. Release of Transcript Restriction set for 9/20/2023. (smn) (Entered: 06/22/2023)
06/23/2023	<u>32</u>	MOTION for Hearing <i>Pursuant to Classified Information Procedures Act</i> by USA as to Donald J. Trump, Waltine Nauta. Responses due by 7/7/2023 (Attachments: # <u>1</u> Text of Proposed Order)(Bratt, Jay) (Entered: 06/23/2023)
06/23/2023	<u>33</u>	MOTION for Bond <i>to Implement Special Condition of Release</i> by USA as to Donald J. Trump, Waltine Nauta. Responses due by 7/7/2023 (Attachments: # <u>1</u> Text of Proposed Order)(Bratt, Jay) (Entered: 06/23/2023)
06/23/2023	<u>34</u>	MOTION to Continue Trial by USA as to Donald J. Trump, Waltine Nauta. Responses due by 7/7/2023 (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C)(Harbach, David) (Entered: 06/23/2023)
06/26/2023	<u>35</u>	MOTION to Intervene and Oppose the Government's Motion to File Witness List Under Seal by WP Company LLC, TEGNA Inc., Reuters News & Media Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc., CMG Media Corporation as to Donald J. Trump, Waltine Nauta re <u>33</u> MOTION for Bond <i>to Implement Special Condition of Release</i> Replies due by 7/3/2023.. Attorney Charles David Tobin added to party CMG Media Corporation(pty:ip). (Tobin, Charles) Modified Title Text and to convert to a Motion on 6/26/2023 (pcs). (Entered: 06/26/2023)
06/26/2023	<u>36</u>	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Chad R. Bowman. Filing Fee \$ 200.00. Receipt # FLSDC–16717919 by Univision Networks & Studios, Inc., Telemundo Network Group LLC, Reuters News & Media Inc., Radio Television Digital News Association, National Cable Satellite Corporation, WP Company LLC, TEGNA Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc. as to Donald J. Trump, Waltine Nauta. Responses due by 7/10/2023 (Attachments: # <u>1</u> Certification, # <u>2</u> Text of Proposed Order)(Tobin, Charles) (Entered: 06/26/2023)
06/26/2023	<u>37</u>	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Maxwell S.Mishkin. Filing Fee \$ 200.00. Receipt # FLSDC–16717981 by Univision Networks & Studios, Inc.,

		Telemundo Network Group LLC, Reuters News & Media Inc., Radio Television Digital News Association, National Cable Satellite Corporation, WP Company LLC, TEGNA Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc. as to Donald J. Trump, Waltine Nauta. Responses due by 7/10/2023 (Attachments: # <u>1</u> Certification, # <u>2</u> Text of Proposed Order)(Tobin, Charles) (Entered: 06/26/2023)
06/26/2023	<u>38</u>	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Matthew S.L. Cate. Filing Fee \$ 200.00. Receipt # FLSDC-16718009 by Univision Networks & Studios, Inc., Telemundo Network Group LLC, Reuters News & Media Inc., Radio Television Digital News Association, National Cable Satellite Corporation, WP Company LLC, TEGNA Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc. as to Donald J. Trump, Waltine Nauta. Responses due by 7/10/2023 (Attachments: # <u>1</u> Certification, # <u>2</u> Text of Proposed Order)(Tobin, Charles) (Entered: 06/26/2023)
06/26/2023	<u>39</u>	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Lauren Russell. Filing Fee \$ 200.00. Receipt # FLSDC-16718168 by Univision Networks & Studios, Inc., Telemundo Network Group LLC, Reuters News & Media Inc., Radio Television Digital News Association, National Cable Satellite Corporation, WP Company LLC, TEGNA Inc., POLITICO LLC, The New York Times Company, NBC Universal Media, LLC, National Public Radio, Inc., Los Angeles Times Communications LLC, Gray Media Groups, Inc., The E.W. Scripps Company, Dow Jones & Company, Inc., Cox Enterprises, Inc., CBS Broadcasting, Inc., Bloomberg L.P., The Associated Press, American Broadcasting Companies, Inc., Advance Publications, Inc., Cable News Networks, Inc. as to Donald J. Trump, Waltine Nauta. Responses due by 7/10/2023 (Attachments: # <u>1</u> Certification, # <u>2</u> Text of Proposed Order)(Tobin, Charles) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Matthew S.L. Cate for Univision Networks & Studios, Inc., Matthew S.L. Cate for Telemundo Network Group LLC, Matthew S.L. Cate for Reuters News & Media Inc., Matthew S.L. Cate for Radio Television Digital News Association, Matthew S.L. Cate for National Cable Satellite Corporation, Matthew S.L. Cate for WP Company LLC, Matthew S.L. Cate for TEGNA Inc., Matthew S.L. Cate for POLITICO LLC, Matthew S.L. Cate for The New York Times Company, Matthew S.L. Cate for NBC Universal Media, LLC, Matthew S.L. Cate for National Public Radio, Inc., Matthew S.L. Cate for Los Angeles Times Communications LLC, Matthew S.L. Cate for Gray Media Groups, Inc., Matthew S.L. Cate for The E.W. Scripps Company, Matthew S.L. Cate for Dow Jones & Company, Inc., Matthew S.L. Cate for Cox Enterprises, Inc., Matthew S.L. Cate for CBS Broadcasting, Inc., Matthew S.L. Cate for Bloomberg L.P., Matthew S.L. Cate for The Associated Press, Matthew S.L. Cate for American Broadcasting Companies, Inc., Matthew S.L. Cate for Advance Publications, Inc., Matthew S.L. Cate for Cable News Networks, Inc. added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Maxwell S. Mishkin, Chad R. Bowman for National Cable Satellite Corporation added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Maxwell S. Mishkin, Chad R. Bowman for Radio Television Digital News Association added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Matthew S.L. Cate for Reuters News & Media Inc. added (pt) (Entered: 06/26/2023)

06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Matthew S.L. Cate for Reuters News & Media Inc. added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Maxwell S. Mishkin, Chad R. Bowman for Telemundo Network Group LLC added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Maxwell S. Mishkin, Chad R. Bowman for Univision Networks & Studios, Inc. added (pt) (Entered: 06/26/2023)
06/26/2023		Attorney update in case as to Donald J. Trump, Waltine Nauta. Attorney Lauren Russell for Univision Networks & Studios, Inc., Lauren Russell for Telemundo Network Group LLC, Lauren Russell for Radio Television Digital News Association, Lauren Russell for National Cable Satellite Corporation added (pt) (Entered: 06/26/2023)
06/26/2023		SYSTEM ENTRY – Docket Entry 40 restricted/sealed until further notice. (pcs) (Entered: 06/26/2023)
06/26/2023	41	PAPERLESS ORDER denying without prejudice <u>33</u> Government's Motion to Implement Special Condition of Release. The Government seeks an order implementing a special condition of bond related to Defendants' communication with eighty-four listed witnesses about the facts of the case, except through counsel [ECF No. 17 p. 4]. The Government conditions its request on the filing of the non-exhaustive list under seal. Defendants take no position on the Government's seal request but reserve the right to object to the special condition and the manner by which the Government intends to implement it. In the meantime, numerous news organizations have moved to intervene to oppose the Government's Motion to File Witness List Under Seal, citing the First Amendment and related legal principles <u>35</u> . Upon review of the foregoing materials, the Government's Motion <u>33</u> is denied without prejudice, and the Motion to Intervene <u>35</u> and accompanying Motions to Appear Pro Hac Vice <u>36</u> <u>37</u> <u>38</u> <u>39</u> are denied as moot. The Government's Motion does not explain why filing the list with the Court is necessary; it does not offer a particularized basis to justify sealing the list from public view; it does not explain why partial sealing, redaction, or means other than sealing are unavailable or unsatisfactory; and it does not specify the duration of any proposed seal. <i>See</i> S.D. Fla. L.R. 5.4(a), (c)(1). The Clerk is directed to return the Pro Hac Vice fees to the filing attorneys. Signed by Judge Aileen M. Cannon on 6/26/2023. (sj00) (Entered: 06/26/2023)
06/26/2023	<u>42</u>	Order Granting Unopposed Motion for Pretrial Conference Pursuant to Section 2 of the Classified Information Procedures Act. A pretrial conference pursuant to Section 2 of the CIPA is set for 7/14/2023 at 10:00 AM in the Fort Pierce Division before Judge Aileen M. Cannon. Signed by Judge Aileen M. Cannon on 6/26/2023. <i>See attached document for full details.</i> (kts) (Entered: 06/26/2023)
06/26/2023	43	PAPERLESS ORDER: On or before July 6, 2023, Defendants shall respond to the Government's Motion for Continuance <u>34</u> , either individually or in a combined filing. Signed by Judge Aileen M. Cannon on 6/26/2023. (kts) (Entered: 06/26/2023)
06/27/2023	<u>44</u>	Minute Order for proceedings held before Ch. Magistrate Judge Edwin G. Torres: Status Conference re: Report Re: Counsel and Arraignment as to Waltine Nauta held on 6/27/2023. Defendant's flight cancelled – not in attendance. Counsel, Stanley Woodward is requesting a continuance of the Report Re: Counsel and Arraignment, no objection from the Government. Arraignment reset for 7/6/2023 at 10:00 AM in Miami Division before MIA Duty Magistrate Judge. Report Re: Counsel Hearing reset for 7/6/2023 at 10:00 AM in Miami Division before MIA Duty Magistrate Judge. (Digital 9:45:48) Signed by Ch. Magistrate Judge Edwin G. Torres on 6/27/2023. (jbs) (Entered: 06/27/2023)
06/28/2023		SYSTEM ENTRY – Docket Entry 45 restricted/sealed until further notice. (amb) (Entered: 06/28/2023)
06/28/2023		SYSTEM ENTRY – Docket Entry 46 restricted/sealed until further notice. (amb) (Entered: 06/28/2023)
06/28/2023	47	PAPERLESS Order as to Waltine Nauta. The Report Re: Counsel Hearing and Arraignment are RESET for 7/6/2023 at 11:00 AM in the Miami Division before Chief

		Magistrate Judge Edwin G. Torres, James Lawrence King Federal Justice Building, 99 NE 4th Street, 10th Floor – Courtroom 5, Miami, FL 33132. Signed by Ch. Magistrate Judge Edwin G. Torres on 6/28/2023. (mdc) (Entered: 06/28/2023)
06/29/2023		SYSTEM ENTRY – Docket Entry 48 restricted/sealed until further notice. (cde) (Entered: 06/29/2023)
06/30/2023	49	PAPERLESS ORDER: In light of the postponement of Defendant Waltine Nauta's arraignment 44 47 , the deadline for Defendants to respond to the Government's Motion for Continuance <u>34</u> is hereby reset to July 10, 2023. Signed by Judge Aileen M. Cannon on 6/30/2023. (kts) (Entered: 06/30/2023)
06/30/2023		Set/Reset Deadlines/Hearings as per order DE#49 in case as to Donald J. Trump, Waltine Nauta <u>34</u> MOTION to Continue Trial . Responses due by 7/10/2023 (drz) (Entered: 06/30/2023)
07/06/2023	<u>50</u>	Minute Order for proceedings held before Ch. Magistrate Judge Edwin G. Torres: Report Re: Counsel Hearing as to Waltine Nauta held on 7/6/2023. Attorney added: Sasha Dadan. ARRAIGNMENT as to Waltine Nauta (2) Count 32,33,34,35,36,38 held on 7/6/2023. (Digital 11:01:39) It is ORDERED AND ADJUDGED that pursuant to the Due Process Protections Act, the Court confirms the United States obligation to disclose to the defendant all exculpatory evidence— that is, evidence that favors the defendant or casts doubt on the United States case, as required by <i>Brady v. Maryland</i> , 373 U.S. 83 (1963) and its progeny, and ORDERS the United States to do so. The government has a duty to disclose any evidence that goes to negating the defendants guilt, the credibility of a witness, or that would reduce a potential sentence. The defendant is entitled to this information without a request. Failure to disclose exculpatory evidence in a timely manner may result in consequences, including, but not limited to, exclusion of evidence, adverse jury instructions, dismissal of charges, contempt proceedings, disciplinary action, or sanctions by the Court. PAPERLESS STANDING DISCOVERY ORDER: The defendant(s) having been arraigned this date in open Court, it is Ordered that within 14 days of the date of this order that all parties to this action shall review and comply with Southern District of Florida Local Rules 88.10 (Criminal Discovery), and 88.9(c) (Motions in Criminal Cases). Upon a sufficient showing, the Court may at any time, upon a properly filed motion, order that the discovery or inspection provided for by this Standing Order be denied, restricted or deferred, or make such other order as is appropriate. It is expected by the Court, however, that counsel for both sides shall make a good faith effort to comply with the letter and spirit of this Standing Order. It shall be the continuing duty of counsel for both sides to immediately reveal to opposing counsel all newly discovered information or other material within the scope of Local Rule 88.10. Signed by Ch. Magistrate Judge Edwin G. Torres on 7/6/2023. (mdc) (Entered: 07/06/2023)
07/06/2023	<u>51</u>	NOTICE OF ATTORNEY PERMANENT APPEARANCE: Sasha Dadan appearing for Waltine Nauta. (drz) (Entered: 07/06/2023)
07/06/2023	<u>52</u>	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Stanley E. Woodward, Jr. Filing Fee \$ 200.00 Receipt # FLS271854 by Waltine Nauta. Responses due by 7/20/2023 (Attachments: # <u>1</u> Certification)(drz) (Entered: 07/06/2023)
07/06/2023	<u>53</u>	NOTICE OF CONVENTIONAL FILING re <u>52</u> MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Stanley E. Woodward, Jr.. Filing Fee \$ 200.00 Receipt # FLS271854, <u>51</u> Notice of Attorney Appearance – Defendant by Waltine Nauta (drz) (Entered: 07/06/2023)
07/06/2023		Attorney update in case as to Waltine Nauta. Attorney Stanley E. Woodward for Waltine Nauta added (pt) (Entered: 07/06/2023)
07/06/2023	54	PAPERLESS ORDER granting <u>52</u> the Motion to Appear <i>Pro Hac Vice</i> , Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney Stanley E. Woodward, Jr. The Court reserves the power to withdraw permission for special appearance at any time. Failure to abide by any court order or

		failure to appear at any scheduled matter may result in immediate revocation of counsel's <i>pro hac vice</i> status. Local counsel must be ready to adequately represent the party at any time. Signed by Judge Aileen M. Cannon on 7/6/2023. (kts) (Entered: 07/06/2023)
07/06/2023	<u>55</u>	OMNIBUS ORDER SETTING TRIAL DATE AND ESTABLISHING PRETRIAL INSTRUCTIONS AND SENTENCING PROCEDURES as to Waltine Nauta. In Limine Motions due by 7/24/2023. Motions due by 7/24/2023. Calendar Call set for 8/8/2023 01:45 PM in Fort Pierce Division before Judge Aileen M. Cannon. Jury Trial set for 8/14/2023 in Fort Pierce Division before Judge Aileen M. Cannon. Signed by Judge Aileen M. Cannon on 7/6/2023. <i>See attached document for full details.</i> (drz) <u>Pattern Jury Instruction Builder</u> – To access the latest, up to date changes to the 11th Circuit Pattern Jury Instructions go to https://pji.ca11.uscourts.gov or click here . (Entered: 07/06/2023)
07/06/2023	56	Clerk's Notice of Filing Fee refunded pursuant to ECF No. 41 PAPERLESS ORDER in the amount of \$200.00 on July 06, 2023 re: <u>36</u> MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Chad R. Bowman. Filing Fee \$ 200.00. Receipt # AFLSDC-16717919. Additional Notice of Electronic Filing (NEF) sent to Financial Clerk (jc) (Entered: 07/06/2023)
07/06/2023	57	PAPERLESS ORDER: On or before July 13, 2023, and as directed by the Litigation Security Group of the Department of Justice, all attorneys of record shall complete all outstanding applicant tasks required to obtain the requisite security clearances in this matter, and thereafter file a Notice of Compliance no later than July 13, 2023. Signed by Judge Aileen M. Cannon on 7/6/2023. (kts) (Entered: 07/06/2023)
07/06/2023	<u>58</u>	ORDER granting provisional CM/ECF access to Defendant Waltine Nauta's counsel, Sasha Dadan. Signed by Ch. Magistrate Judge Edwin G. Torres on 7/6/2023. <i>See attached document for full details.</i> (elk) (Entered: 07/06/2023)
07/06/2023	<u>59</u>	Second RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta (Edelstein, Julie) (Entered: 07/06/2023)
07/07/2023	60	Clerk's Notice of Filing Fee refunded pursuant to ECF No. 41 PAPERLESS ORDER in the amount of \$200.00 on July 07, 2023 re: <u>37</u> MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Maxwell S.Mishkin. Filing Fee \$ 200.00. Receipt # FLSDC-16717981. Additional Notice of Electronic Filing (NEF) sent to Financial Clerk (jc) (Entered: 07/07/2023)
07/07/2023	61	Clerk's Notice of Filing Fee refunded pursuant to ECF No. 41 PAPERLESS ORDER in the amount of \$200.00 on July 07, 2023 re: <u>38</u> MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Matthew S.L. Cate. Filing Fee \$ 200.00. Receipt # AFLSDC-16718009. Additional Notice of Electronic Filing (NEF) sent to Financial Clerk (jc) (Entered: 07/07/2023)
07/07/2023	62	Clerk's Notice of Filing Fee refunded pursuant to ECF No. 41 PAPERLESS ORDER in the amount of \$200.00 on July 07, 2023 re: <u>39</u> MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Lauren Russell. Filing Fee \$ 200.00. Receipt # AFLSDC-16718168. Additional Notice of Electronic Filing (NEF) sent to Financial Clerk (jc) (Entered: 07/07/2023)
07/10/2023	<u>63</u>	MOTION to Continue <i>pretrial CIPA conference</i> by Waltine Nauta. Responses due by 7/24/2023 (Attachments: # <u>1</u> Text of Proposed Order)(Dadan, Sasha) (Entered: 07/10/2023)
07/10/2023	<u>64</u>	Memorandum in Opposition by USA as to Waltine Nauta re <u>63</u> MOTION to Continue <i>pretrial CIPA conference</i> Replies due by 7/17/2023. (Bratt, Jay) (Entered: 07/10/2023)

07/10/2023	<u>65</u>	RESPONSE to Motion by Donald J. Trump as to Donald J. Trump, Waltine Nauta re 63 MOTION to Continue <i>pretrial CIPA conference</i> Replies due by 7/17/2023. (Kise, Christopher) (Entered: 07/10/2023)
07/10/2023	<u>66</u>	RESPONSE in Opposition by Donald J. Trump as to Donald J. Trump, Waltine Nauta re <u>34</u> MOTION to Continue Trial Replies due by 7/17/2023. (Kise, Christopher) (Entered: 07/10/2023)
07/11/2023	<u>67</u>	NOTICE of Change of Address, Email or Law Firm Name by Sasha Dadan (Dadan, Sasha) (Entered: 07/11/2023)
07/11/2023	68	PAPERLESS ORDER: Being fully advised in the premises, the Court grants in part 63 and authorizes a 4-Day Continuance of the Pretrial CIPA Section 2 Conference. The Pretrial CIPA Section 2 Conference is hereby rescheduled to July 18, 2023, at 2:00 P.M. in the Fort Pierce Division. All other aspects of the Court's prior Order <u>42</u> remain in effect. Signed by Judge Aileen M. Cannon on 7/11/2023. (sj00) (Entered: 07/11/2023)
07/11/2023		Reset Hearings as to Donald J. Trump, Waltine Nauta: Per DE#68. Pretrial CIPA Section 2 Conference set for 7/18/2023 DE# Modified on 7/11/2023 (cqs). (Entered: 07/11/2023)
07/11/2023	69	CLERK'S NOTICE – Attorney Admissions has not updated address and/or email information for attorney Sasha Dadan as to Waltine Nauta re <u>67</u> Notice of Change of Address, Email or Law Firm Name. Attorney Sasha Dadan has not completed the required procedures for updating their information with the Court. Attorney is instructed to go to their PACER account, Manage My Account, to complete the process of updating their information. The Court is NOT responsible for updating secondary email addresses. See the Courts website for detailed instructions. www.flstd.uscourts.gov/updates-your-information (pt) (Entered: 07/11/2023)
07/11/2023	<u>70</u>	TRANSCRIPT of REPORT RE: COUNSEL AND ARRAIGNMENT as to Waltine Nauta held on 07/06/2023 before Ch. Magistrate Judge Edwin G. Torres, 1–7 pages, Court Reporter: Stephen Franklin, 561–313–8439 / SFranklinUSDC@aol.com. Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 8/1/2023. Redacted Transcript Deadline set for 8/11/2023. Release of Transcript Restriction set for 10/10/2023. (jes) (Entered: 07/11/2023)
07/11/2023	71	CLERK'S NOTICE – Attorney Admissions has updated only the address information for attorney Sasha Dadan as to Waltine Nauta re <u>67</u> Notice of Change of Address, Email or Law Firm Name. (pt) (Entered: 07/11/2023)
07/11/2023	<u>72</u>	SPEEDY TRIAL REPORT <i>First Speedy Trial Report</i> by USA as to Donald J. Trump, Waltine Nauta (Bratt, Jay) (Entered: 07/11/2023)
07/11/2023	73	CLERK'S NOTICE – Attorney Admissions has not updated primary email information for attorney Sasha Dadan as to Waltine Nauta re <u>67</u> Notice of Change of Address, Email or Law Firm Name. In addition, Attorney selected not to receive notices at her primary email address which is why her email address shows Inactive. Attorney is instructed to go to her PACER account, Manage My Account, to complete the process of updating her primary email information. See the Court's website for detailed instructions. www.flstd.uscourts.gov/updates-your-information . (cw) (Entered: 07/11/2023)
07/12/2023	<u>74</u>	MOTION to Appear Pro Hac Vice, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Stephen H. Weiss. Filing Fee \$ 200.00. Receipt # AFLSDC–16760010 by Donald J. Trump. Responses due by 7/26/2023 (Attachments: # <u>1</u> Certification, # <u>2</u> Text of Proposed Order)(Kise, Christopher) (Entered: 07/12/2023)
07/13/2023		Attorney update in case as to Donald J. Trump. Attorney Stephen H. Weiss for Donald J. Trump added (pt) (Entered: 07/13/2023)
07/13/2023	75	PAPERLESS ORDER granting <u>74</u> the Motion to Appear <i>Pro Hac Vice</i> , Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Attorney Stephen H. Weiss. The Court reserves the power to withdraw permission for

		special appearance at any time. Failure to abide by any court order or failure to appear at any scheduled matter may result in immediate revocation of counsel's <i>pro hac vice</i> status. Local counsel must be ready to adequately represent the party at any time. Signed by Judge Aileen M. Cannon on 7/13/2023. (kts) (Entered: 07/13/2023)
07/13/2023	<u>76</u>	REPLY TO RESPONSE to Motion by USA as to Donald J. Trump, Waltine Nauta re <u>34</u> MOTION to Continue Trial (Harbach, David) (Entered: 07/13/2023)
07/13/2023	<u>77</u>	NOTICE of Compliance by Donald J. Trump re 57 Order, (Kise, Christopher) (Entered: 07/13/2023)
07/13/2023	<u>78</u>	NOTICE of Compliance by Waltine Nauta re 57 Order, (Dadan, Sasha) (Entered: 07/13/2023)
07/17/2023	<u>79</u>	MOTION for Protective Order Pursuant to Section 3 of the Classified Information Procedures Act by USA as to Donald J. Trump, Waltine Nauta. Responses due by 7/31/2023 (Attachments: # <u>1</u> Text of Proposed Order)(Edelstein, Julie) (Entered: 07/17/2023)
07/17/2023	<u>80</u>	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta (Edelstein, Julie) (Entered: 07/17/2023)
07/17/2023	<u>81</u>	PAPERLESS ORDER: The parties shall be prepared to discuss the Government's Motion for Continuance and Proposed Revised Scheduling Order <u>34</u> at the CIPA Section 2 pretrial conference scheduled for July 18, 2023, including the proposed deadlines contained therein [34-2] and particularized objections thereto, in light of 18 U.S.C. § 3161, the Federal Rules of Criminal Procedure, and the CIPA. Signed by Judge Aileen M. Cannon on 7/17/2023. (kts) (Entered: 07/17/2023)
07/18/2023	<u>82</u>	PAPERLESS Minute Entry for proceedings held before Judge Aileen M. Cannon: Pretrial Conference Pursuant to Section 2 of CIPA held on July 18, 2023. The Court heard argument from the parties on the Government's Motion for Continuance and Request for Proposed Revised Scheduling Order <u>34</u> . The Court denied the Government's Motion for Protective Order <u>79</u> without prejudice for lack of meaningful conferral. Order to follow. Total time in court: 1 hour, 40 minutes. Attorney Appearances: Jay I. Bratt, David Harbach, Julie A. Edelstein, Christopher Michael Kise, Todd Blanche, Sasha Dadan, Stanley E. Woodward. Other Appearances: Waltine Nauta. Court Reporter: Diane Miller, 772-467-2337 / Diane_Miller@flsd.uscourts.gov. (kts) (Entered: 07/19/2023)
07/21/2023	<u>83</u>	ORDER GRANTING IN PART GOVERNMENT'S MOTION <u>34</u> TO CONTINUE TRIAL AND RESETTING DEADLINES. The Government's Motion to Continue Trial and Revised Proposed Schedule <u>34</u> is GRANTED IN PART. Calendar Call is hereby reset for Tuesday, 5/14/2024 at 01:45 PM in Fort Pierce Division before Judge Aileen M. Cannon. Jury Trial is hereby reset for Monday, 5/20/2024 at 09:30 AM in Fort Pierce Division before Judge Aileen M. Cannon. Signed by Judge Aileen M. Cannon on 7/21/2023. See attached document for full details. (mno) (Entered: 07/21/2023)
07/27/2023	<u>84</u>	Renewed MOTION for Protective Order Pursuant to Section 3 of the Classified Information Procedures Act by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira. Responses due by 8/10/2023 (Attachments: # <u>1</u> Text of Proposed Order)(Edelstein, Julie) (Entered: 07/27/2023)
07/27/2023	<u>85</u>	SUPERSEDING INDICTMENT as to Donald J. Trump (1) count(s) 1s-32s, 33s, 34s, 35s, 36s, 37s, 38s, 40s, 41s, Waltine Nauta (2) count(s) 33s, 34s, 35s, 36s, 37s, 39s, 40s, 41s, Carlos De Oliveira (3) count(s) 33s, 40s, 41s, 42s. (mdc) (Additional attachment(s) added on 7/27/2023: # <u>1</u> Restricted Unredacted Indictment) (mdc). (Entered: 07/27/2023)
07/27/2023	<u>86</u>	NOTICE of Superseding Indictment by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira re <u>85</u> Indictment, (Thakur, Michael) (Entered: 07/27/2023)
07/27/2023	<u>87</u>	Criminal Summons Issued in case as to Carlos De Oliveira. Documents contained herein are restricted from public viewing pursuant to the Judicial Conference Policy on Privacy and Public Access to Electronic Case Files. Initial Appearance and Arraignment set for 7/31/2023 10:30 AM in Miami Division before Chief Magistrate Judge Edwin G. Torres. (mdc) (Entered: 07/27/2023)

07/28/2023	88	NOTICE OF HEARING as to Carlos De Oliveira: An Initial Appearance is set for 7/31/2023 at 10:30 AM in the Miami Division before Chief Magistrate Judge Edwin G. Torres, James Lawrence King Federal Justice Building, 99 NE 4th Street, 10th Floor – Courtroom 5, Miami, FL 33132. (mdc) (Entered: 07/28/2023)
07/31/2023	<u>89</u>	Minute Order for proceedings held before Ch. Magistrate Judge Edwin G. Torres: Initial Appearance as to Carlos De Oliveira held on 7/31/2023. The Court GRANTS the ore tenus motion for John Irving from Washington D.C. to appear as Temporary Counsel of record. Local counsel has not yet been retained. Bond recommendation/set: Carlos De Oliveira (3) The Court sets bond \$100K PSB. Date of Location Custody (Arrest or Surrender): 7/31/2023. Arraignment set for 8/10/2023 10:00 AM in Fort Pierce Division before FTP Duty Magistrate Judge. Report Re: Counsel Hearing set for 8/10/2023 10:00 AM in Fort Pierce Division before FTP Duty Magistrate Judge. (Digital 10:33:34) Signed by Ch. Magistrate Judge Edwin G. Torres on 7/31/2023. (kan) Modified text on 7/31/2023 (kan). (Entered: 07/31/2023)
07/31/2023	<u>90</u>	\$100,000.00 PSB Bond Entered as to Carlos De Oliveira Approved by Ch. Magistrate Judge Edwin G. Torres. <i>Please see bond image for conditions of release.</i> (kan) (Additional attachment(s) added on 7/31/2023: # <u>1</u> Restricted Bond with 7th Page) (kan). (Entered: 07/31/2023)
07/31/2023	91	PAPERLESS Order as to Carlos De Oliveira. John Irving of Washington DC appeared as Temporary Counsel of Record. Local Counsel has not yet been retained. A Report Re: Counsel Hearing and Arraignment are set for 8/10/2023 at 10:00 AM in the Fort Pierce Division before the FTP Duty Magistrate Judge. Signed by Ch. Magistrate Judge Edwin G. Torres on 7/31/2023. (mdc) (Entered: 07/31/2023)
07/31/2023	<u>92</u>	Supplemental RESPONSE to Standing Discovery Order by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Edelstein, Julie) (Entered: 07/31/2023)
08/01/2023	<u>93</u>	SPEEDY TRIAL REPORT <i>Second Speedy Trial Report</i> by USA as to Donald J. Trump, Waltine Nauta, Carlos De Oliveira (Bratt, Jay) (Entered: 08/01/2023)
08/01/2023	94	PAPERLESS Order as to Donald J. Trump and Waltine Nauta. The Arraignment on the Superseding Indictment is set for 8/10/2023 at 10:00 AM in the Fort Pierce Division before U.S. Magistrate Judge Shaniek Mills Maynard at the Alto Lee Adams, Sr. United States Courthouse, 101 South U.S. Highway 1, 4th Floor – Courtroom 4074, Fort Pierce, FL 34950. Signed by Ch. Magistrate Judge Edwin G. Torres on 8/1/2023. (mdc) (Entered: 08/01/2023)
08/02/2023		SYSTEM ENTRY – Docket Entry 95 restricted/sealed until further notice. (amb) (Entered: 08/02/2023)
08/02/2023		SYSTEM ENTRY – Docket Entry 96 restricted/sealed until further notice. (amb) (Entered: 08/02/2023)
08/02/2023	<u>97</u>	MOTION for Hearing <i>on Potential Conflicts of Interest, pursuant to United States v. Garcia, 517 F.2d 272 (5th Cir. 1975)</i> , by USA as to Waltine Nauta. Responses due by 8/16/2023 (Thakur, Michael) (Entered: 08/02/2023)
08/04/2023	<u>98</u>	WAIVER of Personal Appearance at Arraignment and Entry of Plea of Not Guilty by Donald J. Trump (Kise, Christopher) (Entered: 08/04/2023)
08/04/2023	<u>99</u>	TRANSCRIPT of Initial Appearance Proceedings as to Carlos De Oliveira held on 07/31/2023 before Ch. Magistrate Judge Edwin G. Torres, Volume Number 1 of 1, 1–11 pages, Court Reporter: Quanincia Hill, 305–523–5634 / Quanincia_Hill@flsd.uscourts.gov . Transcript may be viewed at the court public terminal or purchased by contacting the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 8/25/2023. Redacted Transcript Deadline set for 9/5/2023. Release of Transcript Restriction set for 11/2/2023. (qhl) (Entered: 08/04/2023)