

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

IN RE DONALD J. TRUMP

Case No. 1:25-mc-00008-JEB

HON JAMES E. BOASBERG

**MOTION TO AMEND SCHEDULE, OR ALTERNATIVELY, FOR EXTENSION OF
TIME TO MOVE FOR GREATER DISCLOSURE**

Petitioners The New York Times Company and Charlie Savage (together, “The Times”), by and through their undersigned counsel, respectfully move to amend the schedule in this case to require the parties to submit a joint status report within 45 days of today’s date. Alternatively, The Times seeks an extension of time to file its motion for greater disclosure.

On September 25, 2025, the Court ordered that the Department of Justice (“DOJ”) release redacted copies of the judicial records requested by The Times, consistent with its August 11, 2025, order. The Court also ordered The Times to file a motion for greater disclosure if it believed the redactions in the materials were greater than warranted. The current deadline to file that motion is December 12, 2025.

The Times is still reviewing those redactions. In the meantime, however, The Times has requested that the DOJ also produce transcripts of any hearings in the ancillary grand jury proceedings referenced in The Times’s unsealing application. *See* Dkt. 1. The Times requested those transcripts in its initial application. *Id.* But after discussions with the DOJ, The Times agreed to limit its initial request of materials to the relevant opinions, orders, and dockets sheets, reserving the right to seek other records later. The DOJ has now agreed to consider The Times’s request for transcripts. The DOJ has advised that it will review those transcripts and will then take a position on whether and to what extent they can be released.

The Times accordingly proposes that the Court amend the existing schedule and direct the parties to file a joint status report within 45 days of today's date. Alternatively, The Times requests that the Court extend by 45 days the deadline for The Times to file its motion for greater disclosure.

Pursuant to Local Civil Rule 7(m), counsel for The Times conferred with counsel for the DOJ regarding the relief sought. Counsel for the DOJ indicated that the government consents to the requested relief.

Dated: December 9, 2025

Respectfully submitted,

/s/ Al-Amyn Sumar
Al-Amyn Sumar (#1614655)
The New York Times Company
1627 I Street NW, Suite 700
Washington, DC 20006
Telephone: (202) 862-7705
al-amyn.sumar@nytimes.com

*Counsel for The New York Times Company and
Charlie Savage*