

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF FLORIDA**
Orlando Division

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|-----------------------------------------|---|--------------------------------------|
| Enrique Tarrío, et al., |) | |
| |) | |
| <i>Plaintiffs,</i> |) | |
| |) | |
| v. |) | Case No.: 6:25-cv-998-WWB-DCI |
| |) | |
| United States of America, et al. |) | |
| |) | |
| <i>Defendants.</i> |) | |
| |) | |

MOTION FOR CLARIFICATION

COME NOW Plaintiffs Enrique Tarrío, Zachary Rehl, Ethan Nordean, Joseph Biggs, and Dominic Pezzola (collectively, "Plaintiffs"), by and through undersigned counsel, and respectfully submit this Motion for Clarification on the Court’s Standing Order Requiring Disclosure of Third-Party Litigation Funding (“Order”).

As indicated in the Plaintiffs’ Verified Disclosure of Third-Party Funding (“Disclosure”), the Plaintiffs utilized some of the money they raised in a GiveSendGo (“GSG”) fundraising campaign to make payments to Plaintiffs’ counsel. The names of the donors to that campaign (“Donors”) were disclosed, though they were self-reported, so many of the names appear to be messages, nicknames, or otherwise obscured to maintain anonymity, along with the amounts and dates of the donations. Plaintiffs did not disclose the Donors’ emails because the Order does not appear to require it, and the Plaintiffs are concerned about the Donors’ privacy and digital safety. The purpose of this Motion for Clarification is to address what further obligations the Plaintiffs have under the Order to remain compliant therewith.

1. Two thousand two hundred and sixty-four small donations were made by thousands of small donors, though some appear to have been repeat donors. Other than their

emails, everything Plaintiffs know about the donors was disclosed to the court in the Disclosure.

As indicated in the Disclosure, none of the Donors has a contract with the Plaintiffs or the Plaintiffs' counsel or firm and has no power to veto or influence any settlement negotiations.

Notwithstanding the foregoing, the Plaintiffs would request to know whether the Court considers the Plaintiffs' Disclosure incomplete or not in compliance with the Order, and would like them to attempt to communicate with each donor in an attempt to ascertain¹:

- a. Where the donor did not provide a legal name, the donor's legal name;
- b. What the current address of the donor is;
- c. Whether the donor is associated with a foreign government or governments; and,
- d. Whether the donation they made derived from funds provided by a foreign government or governments.

2. If the Court would like the Plaintiffs to attempt to ascertain the above information, it will be an arduous and extremely time-consuming process, and the Plaintiffs would like clarification on the time period in which the Court would like the Plaintiffs to accomplish this task.

3. The Order does not require the Plaintiffs to disclose the email addresses of Third-Party Funders, but in an excess of caution, and a desire to be as compliant with the Order as possible, the Plaintiffs would respectfully request the Court to clarify whether:

- a. The Court would like the Plaintiffs to disclose the self-reported email addresses of the Donors; and,

¹ The Plaintiffs note that, even if they were to undertake this task, that they would have no way of compelling any donor to respond or verifying any answer provided by the Donor.

- b. If so, whether the Plaintiffs would be able to file the unredacted donor list with emails under seal to protect, as much as possible, the donor's privacy and digital safety.

WHEREFORE, and for the foregoing reasons, Plaintiff respectfully asks for clarification on the matters detailed above so that the Plaintiff can ensure full compliance with the Court's standing order.

Respectfully submitted this 12th day of March, *Anno Domini* 2025.

 /s/ Thomas F. Ranieri
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 12, 2026, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of the filing to the following CM/ECF participants:

Siegmund F. Fuchs, Esq.

 /s/ Thomas F. Ranieri
Thomas F. Ranieri, Esq.