

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 22-14102-CIV-MIDDLEBROOKS/REINHART

DONALD J. TRUMP,

Plaintiff,

v.

HILLARY R. CLINTON, et al.

Defendants.

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**RESPONSE IN OPPOSITION TO UNITED STATES' MOTION TO PRECLUDE  
THE FURTHER FILING OF ADDRESSES  
OF FORMER FEDERAL BUREAU OF INVESTIGATION EMPLOYEES**

The Defendant, DONALD J. TRUMP, by and through his undersigned attorneys, hereby files his Response in Opposition to the United States' Motion to Preclude the Further Filing of Addresses of Former Federal Bureau of Investigation Employees with Permission to File Redacted Versions of Any Offending Documents (hereinafter the "Motion") [D.E. 84], and in opposition thereto state:

No one in their right mind would want to see harm befall any FBI agents, presently active, or retired, not only including the former President of the United States, but especially the former President. In this regard, his undersigned attorneys, after realizing the issue when the summonses were filed, gave permission to the government attorneys to make it clear that the Motion to Redact was unopposed.

Through that time, as obvious as it should have been to all of the attorneys, no mention was made of handling the returns of service, and the addresses of two of the agents were again put in the public record. At this point, there are 2 former agents, the service of service of process remaining to

be served, returned, and filed. The undersigned has made it well understood to the people in his office who file materials in the Court that no such filings are to be made again. The certainty is now there, that no such filings will be made, going forward.

The President, through his undersigned attorney, though, does object to an order being filed, in that his attorney should be trusted to do whatever is necessary to protect sensitive information from being released, and one who is not a threat should not be enjoined in any way. No order is required.

The fact that no one gave consideration when the subpoenas were filed to the confidential addresses of the agents or when the first returns of service were filed, does not mean that further filings would be made with their addresses, now that all have been alerted to the situation.

More, even if a mistake were to be made again, there has never been any hesitation in being able to quickly secret them. In fact, the undersigned has given permission to the attorney for the government to file any motion he should want to seal or redact, and that he has perpetual agreement, so that there is no need to confer.

However, the most important reason to not issue an issue forbidding the filing of the addresses of the former FBI agents is that these addresses are not secret, at all, in any event. It literally took the assistant in The Ticktin Law Group less than 5 minutes to obtain each of the addresses which the government now wants to protect.

The government has made no effort to close all of the other channels in which the addresses are available. Instead, it is left totally accessible on the internet. Apparently, the former agents do not have the same concerns as most active agents to assure confidentiality of their addresses, as each of them is taking no action to prevent others from getting their addresses.

To now decide that the attorneys for the Plaintiff, be ordered to not file the addresses, which they are not filing, anyway, and which could easily be removed without objection, would be similar to having the captain of the Titanic locking the door to his wheelhouse to stop the ship from sinking.

Additionally, it must be considered that the United States is not a party to this action, yet it has been freely filing documents in this case regarding the summonses and related redactions. The last word from the movant is that he is not filing a notice of appearance as his clients have not been served yet.

The United States should not be permitted to expend any of this Court's precious time in filing an unnecessary motion.

As such, the Plaintiff opposes this Motion, which seeks relief which is not necessary and has no true benefit.

WHEREFORE, the Defendant respectfully requests the Court deny the United States' Motion to Preclude the Further Filing of Addresses of Former Federal Bureau of Investigation Employees.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed this 28<sup>th</sup> day of April, 2022, with the Clerk of Court using CM/ECF, which will send a notice of electronic filing to all Parties listed on the Service List.

/s/ Peter Ticktin

**THE TICKTIN LAW GROUP**  
Peter Ticktin, Esquire  
Florida Bar No.: 887935  
[Serv512@LegalBrains.com](mailto:Serv512@LegalBrains.com)  
Jamie Alan Sasson, Esquire  
Florida Bar No.: 10802  
[Serv513@LegalBrains.com](mailto:Serv513@LegalBrains.com)  
270 SW Natura Avenue  
Deerfield Beach, Florida 33441-1610  
Telephone: (954) 570-6757  
*Attorneys for the Plaintiff*

**HABBA MADAIO & ASSOCIATES**  
Alina Habba, Esquire  
[ahabba@habbalaw.com](mailto:ahabba@habbalaw.com)  
Michael T. Madaio, Esquire  
[mmadaio@habbalaw.com](mailto:mmadaio@habbalaw.com)  
1430 US Highway 206 Suite 240  
Bedminster, New Jersey 07921  
Telephone: (908) 869-1188  
*Attorneys for the Plaintiff*

**SERVICE LIST**

Anthony Erickson-Pogorzelski, Esquire  
Fla. Bar No. 619884  
[Anthony.Pogorzelski@usdoj.gov](mailto:Anthony.Pogorzelski@usdoj.gov)  
**Assistant U.S. Attorney**  
99 N.E. 4<sup>th</sup> Street, Suite 300  
Miami, Florida 33132  
Telephone: 305- 961-9296  
*Attorneys for Defendant*  
*United States of America*

David E. Kendall, Esquire  
[dkendall@wc.com](mailto:dkendall@wc.com)  
**Williams & Connolly, LLP**  
725 12th Street NW  
Washington, DC 20005-3901  
Telephone: 202-434-5000  
*PRO HAC VICE*  
*Attorney for the Defendant*  
*Hillary R. Clinton*

David Oscar Markus, Esquire  
[dmarkus@markuslaw.com](mailto:dmarkus@markuslaw.com)  
**Markus/Moss, LLP**  
40 N.W. Third Street  
Penthouse 1  
Miami, Florida 33128  
Telephone: 305-379-6667  
*Attorneys for the Defendant*  
*Hillary R. Clinton*

Katherine M. Turner, Esquire  
[ktturner@wc.com](mailto:ktturner@wc.com)  
**Williams & Connolly, LLP**  
725 12th Street NW  
Washington, DC 20005-3901  
Telephone: 202-434-5000  
*PRO HAC VICE*  
*Attorney for the Defendant*  
*Hillary R. Clinton*

Michael J. Mestitz, Esquire  
[mmestitz@wc.com](mailto:mmestitz@wc.com)  
**Williams & Connolly, LLP**  
725 12th Street NW  
Washington, DC 20005-3901  
Telephone: 202-434-5000  
*PRO HAC VICE*  
*Attorney for the Defendant*  
*Hillary R. Clinton*

Jonathan Edward Levine, Esquire  
[Jonathan.levine@levinepllc.com](mailto:Jonathan.levine@levinepllc.com)  
**Levine & Associates, PLLC**  
5311 Lee Highway  
Arlington, Virginia 22207  
Telephone: 703-525-2668  
*Attorney for Defendant*  
*Charles Halliday Dolan, Jr.*

George R.A. Doumar, Esquire  
[gdoumar@doumarmartin.com](mailto:gdoumar@doumarmartin.com)  
**Mahdavi, Bacon, Halfhill & Young, PLLC**  
11350 Random Hills Road, Suite 700  
Fairfax, Virginia 22030

Telephone: 703-352-1300  
*PRO HAV VICE*  
*Attorney for Defendant*  
*Charles Halliday Dolan, Jr*

Franklin G. Monsour, Jr., Esquire  
[fmonsour@orrick.com](mailto:fmonsour@orrick.com),  
**Orrick, Herrington & Stcliffe, LLP**  
51 West 52<sup>nd</sup> Street  
New York, New York 10019  
Telephone: 202-339-8533  
*PRO HAC VICE*  
*Attorney for Defendant*  
*Igor Danchenko*

Diana Marie Fassbender, Esquire  
[dszego@orrick.com](mailto:dszego@orrick.com)  
**Orrick, Herrington & Stcliffe, LLP**  
1152 15<sup>th</sup> Street NW  
Washington, D.C. 20005  
*PRO HAC VICE*  
*Attorney for Defendant*  
*Igor Danchenko*

Alexandra N. Epps, Esquire  
[aeps@qslwm.com](mailto:aeps@qslwm.com)  
**Quiling Selander Lownds Winslet and Moser**  
6900 North Dallas Parkway, Suite 800  
Plano, Texas 75024  
Telephone: 214-560-5463  
*Attorney for the Defendant*  
*Nuestar, Inc.*

Adam Seth Fels, Esquire  
[afels@ffslawfirm.com](mailto:afels@ffslawfirm.com)  
Florida Bar No.: 0114917  
**Fridman Fels & Soto, PLLC**  
2525 Ponce de Leon Blvd., Ste 750  
Coral Gables, FL 33134  
Telephone: 305-569-7701  
*Attorney for the Defendant*  
*Bruce Ohr and Nellie Ohr*  
*Fusion GPS*  
*Glenn Simpson*  
*Peter Fritsch*

Kevin P. Crenny, Esquire  
[kcrenny@levyfirestone.com](mailto:kcrenny@levyfirestone.com)  
**Levy Firestone Muse, LLP**  
900 17<sup>th</sup> Street NW, Suite 1200  
Washington, D.C., 20006  
Telephone: 202-845-3215  
*PRO HAV VICE*  
*Attorney for the Defendant*  
*Fusion GPS*  
*Glenn Simpson*  
*Peter Fritsch*

Joshua Levy, Esquire  
[jal@levyfirestone.com](mailto:jal@levyfirestone.com)  
**Levy Firestone Muse, LLP**  
900 17<sup>th</sup> Street NW, Suite 1200  
Washington, D.C., 20006  
Telephone: 202-845-3215  
*PRO HAV VICE*  
*Attorney for the Defendant*  
*Fusion GPS*  
*Glenn Simpson*  
*Peter Fritsch*

Rachel Clattenburg, Esquire  
[rmc@levyfirestone.com](mailto:rmc@levyfirestone.com)  
**Levy Firestone Muse, LLP**  
900 17<sup>th</sup> Street NW, Suite 1200  
Washington, D.C., 20006  
Telephone: 202-845-3215  
*PRO HAV VICE*  
*Attorney for the Defendant*  
*Fusion GPS*  
*Glenn Simpson*  
*Peter Fritsch*

Joshua Berman, Esquire  
[Joshua.Berman@cliffordChance.com](mailto:Joshua.Berman@cliffordChance.com)  
**Clifford Chance US, LLP**  
2011 K. Street, NW  
Washington, D.C., 20006-1001  
Telephone: 202-912-5000  
*Pro Hac Vice*  
*Attorney for Defendants*

*Nellie Ohr and Bruce Ohr*

Benjamin Peacock, Esquire  
[Benjamin.Peacock@cliffordChance.com](mailto:Benjamin.Peacock@cliffordChance.com)

**Clifford Chance US, LLP**

2011 K. Street, NW  
Washington, D.C., 20006-1001  
Telephone: 202-912-5000

*Pro Hac Vice*

*Attorney for Defendants*

*Nellie Ohr and Bruce Ohr*

Eugene K. Pettis, Esquire

[cmarr@hpslegal.com](mailto:cmarr@hpslegal.com)

[Service@hpslegal.com](mailto:Service@hpslegal.com)

**Haliczer Pettis & Schwamm P.A.**

100 SE 3rd Avenue, 7th Floor  
Fort Lauderdale, FL 33394  
Telephone: 954-523-9922

*Attorneys for Defendant*

*Marc Elias*

Debra P. Klauber, Esquire

[dklauber@hpslegal.com](mailto:dklauber@hpslegal.com)

[Service@hpslegal.com](mailto:Service@hpslegal.com)

**Haliczer Pettis & Schwamm P.A.**

100 SE 3rd Avenue, 7th Floor  
Fort Lauderdale, FL 33394  
Telephone: 954-523-9922

*Attorneys for Defendant*

*Marc Elias*

April A. Otterberg, Esquire

[aotterberg@jenner.com](mailto:aotterberg@jenner.com)

**Jenner & Block, LLP**

353 N. Clark Street  
Chicago, IL 60654-3454  
Telephone: 312-222-9350

*PRO HAC VICE*

*Attorney for the Defendant*

*Marc Elias*

Reid J. Schar, Esquire



[rschar@jenner.com](mailto:rschar@jenner.com)

**Jenner & Block, LLP**

353 N. Clark Street  
Chicago, IL 60654-3454  
Telephone: 312-222-9350  
*PRO HAV VICE*

*Attorney for the Defendant*  
*Marc Elias*

Roberto Martinez, Esquire

[Bob@colson.com](mailto:Bob@colson.com)

[becky@colson.com](mailto:becky@colson.com)

Florida Bar No.: 305596  
**Colson Hicks Eidson, P.A.,**  
255 Alhambra Circle, Penthouse  
Coral Gables, Florida 33134  
Telephone: 305-476-7400

*Attorney for the Defendant*  
*Michael Sussmann*

Eleni Kastrenakes Howard, Esquire

[Eleni.kastrenakeshoward@akerman.com](mailto:Eleni.kastrenakeshoward@akerman.com)

Florida Bar No.: 73073

**Akerman, LLP**

777 S. Flagler Drive, Suite 1100, West Tower  
West Palm Beach, Florida 33401  
Telephone: 561-653-5000

*Attorney for the Defendant*  
*Perkins Coie, LLP*

Howard Jay Harrington, Esquire

[Jay.harrington@akerman.com](mailto:Jay.harrington@akerman.com)

Florida Bar No.: 0118719

**Akerman, LLP**

777 S. Flagler Drive, Suite 1100, West Tower  
West Palm Beach, Florida 33401  
Telephone: 561-653-5000

*Attorney for the Defendant*  
*Perkins Coie, LLP*

William R. Barzee, Esquire

[williambarzee@barzeeflores.com](mailto:williambarzee@barzeeflores.com)

**Barzee Flores**

Courthouse Center, Penthouse One  
40 NW Third Street

Miami, Florida 33128  
Telephone: 3025-374-3998  
*Counsel for the Defendant*  
*Robert E. Mook*

Gerald E. Greenberg, Esquire  
[ggrenberg@gspa.com](mailto:ggrenberg@gspa.com)  
Florida Bar No.: 440094  
**Gelber Schachther & Greenberg, P.A.**  
One South East Third Avenue, Suite 2600  
SunTrust International Center  
Miami, Florida 33131  
Telephone: 305-728-0950  
*Attorney for the Defendant*  
*Democratic National Committee*  
*DNC Services Corporation*  
*Debbie Wasserman Schultz*

Shawn G. Crowley, Esquire  
**Kaplan Hecker & Fink, LLP**  
[scrowley@kaplanhecker.com](mailto:scrowley@kaplanhecker.com)  
350 5<sup>th</sup> Avenue, 63<sup>rd</sup> Floor  
New York, New York 10118  
Telephone: 212-763-0883  
*PRO HAC VICE*  
*Attorney for the Defendants*  
*Democratic National Committee*  
*DNC Services Corporation*

Edward Soto, Esquire  
[Edward.soto@weil.com](mailto:Edward.soto@weil.com)  
Florida Bar No.: 0265144  
**Weil Gotshal & Manges, LLP**  
1395 Brickell Avenue, Suite 1200  
Miami, Florida 33131  
Telephone: 305-577-3100  
*PRO HAC VICE*  
*Attorney for the Defendant*  
*Rodney Joffe*

Steven Tyrell, Esquire  
[Steven.tyrell@weil.com](mailto:Steven.tyrell@weil.com)  
**Weil, Gotshal & Manges, LLP**  
2001 M St. NW, Suite 600  
Washington, D.C. 20063

Telephone:  
*PRO HAC VICE*  
*Attorney for the Defendant*  
*Rodney Joffe*

Noah Brozinsky, Esquire  
[nbrozinsky@kaiserDillon.com](mailto:nbrozinsky@kaiserDillon.com)  
Florida Bar No.: 010470  
**KaiserDillon, PLLC**  
1099 14<sup>th</sup> Street NW, 8<sup>th</sup> Floor West  
Washington, D.C. 20005  
*Attorney for the Defendant*  
*Kevin E. Clinesmith*

Christopher Muha, Esquire  
[CMuha@kaiserdillon.com](mailto:CMuha@kaiserdillon.com)  
**KaiserDillon, PLLC**  
1099 14<sup>th</sup> Street NW, 8<sup>th</sup> Floor West  
Washington, D.C. 20005  
Telephone: 202-640-2850  
*PRO HAC VICE*  
*Attorney for the Defendant*  
*Kevin E. Clinesmith*

William Pittard, Esquire  
[WPittard@Kaiswerdillon.com](mailto:WPittard@Kaiswerdillon.com)  
**KaiserDillon, PLLC**  
1099 14<sup>th</sup> Street NW, 8<sup>th</sup> Floor West  
Washington, D.C. 20005  
Telephone: 202-640-2850  
*PRO HAC VICE*  
*Attorney for the Defendant*  
*Kevin E. Clinesmith*