

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO: 22-cv-81294-CANNON

DONALD J. TRUMP,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

_____ /

PLAINTIFF'S NOTICE OF FILING

The Plaintiff, DONALD J. TRUMP, pursuant to this Court's Order and the applicable rules of the Federal Rules of Civil Procedure, respectfully files a proposed Judicial Protective Order to be considered by this Court. On September 20, 2022, the Defendant filed its proposed Protective Order [ECF No. 102]. The Plaintiff's proposed Order tracks that of the Defendant except as to the language in paragraph 2. The Plaintiff proposes that the names of those given access to the Seized Materials be provided to the Special Master, and not to the Government. The Government has not disclosed and does not plan to disclose the names of all persons on their side, and the Plaintiff therefore should not be treated any differently. Moreover, the Special Master can maintain the list of names so that in the event there are any compliance issues, there will exist a written record of the requisite acknowledgements.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 23rd, 2022, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notice of Electronic Filing.

Respectfully submitted,

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