

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

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DONALD J. TRUMP,

Plaintiff,

- against -

**STAFFING, COMPENSATION,
AND EXPENSE PROPOSAL**
No. 22-81294-CIV-CANNON

UNITED STATES OF AMERICA,

Defendant.

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RAYMOND J. DEARIE, Special Master

Pursuant to the Order Appointing Special Master, ECF 91 (“Appointing Order”), as amended by the Order Following Partial Stay, ECF No. 104, the undersigned submits this staffing, compensation, and expense proposal.

In both the Case Management Plan filed on September 22, 2022, ECF 106 (“Plan”), and the Amended Case Management Plan filed on September 23, 2022 (“Amended Plan”), the undersigned notified the parties as follows:

The undersigned has determined that the efficient administration of the Special Master’s duties requires the assistance of the Honorable James Orenstein (Ret.), a former United States Magistrate Judge for the Eastern District of New York, who has experience with complex case management, privilege review, warrant procedures, and other matters that may arise in the course of the Special Master’s duties. Judge Orenstein has served as an appointed amicus curiae in the Foreign Intelligence Surveillance Court pursuant to 50 U.S.C. § 1803(i)(2) and currently holds Top Secret clearance.

The undersigned will also utilize Eastern District of New York court staff in carrying out his duties as Special Master. The undersigned will promptly notify the parties of any need for additional professionals, support staff, or expert consultants.

As a United States District Judge in active service, the undersigned will seek no additional compensation for performing the duties of Special Master in this action. The undersigned proposes that Judge Orenstein be compensated at the hourly rate of \$500. The undersigned further proposes that the Special Master will

provide the parties with monthly invoices, starting on October 1, 2022, setting forth the hours worked and expenses to be reimbursed. No later than seven calendar days after receiving each such invoice, Plaintiff shall notify the undersigned of any objections to the invoice, which will be promptly reviewed and resolved. No later than seven calendar days after the undersigned has resolved any such disputes (or seven calendar days after receiving an invoice as to which Plaintiff raises no objections), Plaintiff will submit payment in full as directed on the invoice. Failure to make timely payment will be deemed a violation of the Special Master's order subject to sanction pursuant to Federal Rule of Civil Procedure 53(c)(2).

The parties may submit comments on the foregoing staffing, compensation, and expense proposal no later than September 24, 2022, after which time the undersigned shall submit the proposal to the Court for consideration and approval. *See* Appointing Order, ¶¶ 14-15.

Plan at 5-6; Amended Plan at 5-6.

No party has submitted any comment to the foregoing proposal, and the time for such comment has lapsed. Accordingly, the undersigned respectfully submits the foregoing proposal to the Court for approval.

Dated: Brooklyn, New York
September 27, 2022

/s/ Raymond J. Dearie
RAYMOND J. DEARIE
United States District Judge