

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO: 22-CV-81294-AMC

DONALD J. TRUMP,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

_____ /

**MOTION TO FILE
LOG AND COVER LETTER UNDER SEAL**

The United States of America, through the undersigned attorneys assigned to its Privilege Review Team, respectfully move this Court to file under seal a cover letter to the Special Master and an attached log (Attachment A), which is made by the parties pursuant to the Amended Case Management Plan. (*See* DE:112 at pg. 4).¹ These documents should be sealed because they refer, in part, to documents that have been designated potentially privileged. *See* DE:91 at ¶ 9 (directing Special Master to file under seal any potentially privileged . . . material that is submitted to be filed under seal).

WHEREFORE, the United States respectfully request permission to file later today on

¹ The United States consulted with Plaintiff's counsel on October 3, 2022, and counsel agree that the letter and attachment should be filed under seal. The parties further agree that the letter should be unsealed if so ordered by the Court, once a final determination has been made on issues related to the attorney-client privilege and attorney work product doctrine.

behalf of both parties a joint cover letter to the Special Master, with an attached log.

Respectfully submitted,

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

By: /s/Anthony W. Lacosta
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 3, 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 via transmission of Notices of Electronic Filing generated by CM/ECF.

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