



U.S. Department of Justice

National Security Division

Counterintelligence and Export Control Section

Washington, D.C. 20530

October 11, 2022

By ECF and Courtesy Copy

Judge Raymond J. Dearie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11202

*Re: Donald J. Trump v. United States of America, Case No. 22-81294-CIV-CANNON –
Government Update on Availability of Electronic Copies of Seized Materials*

Dear Judge Dearie:

Consistent with Judge Cannon’s order (ECF 125, at 3), the government expects to provide Plaintiff and the Special Master access to electronic copies of the Seized Materials (excluding filter materials and documents with classification markings) tomorrow, Wednesday, October 12, 2022. Scanning of those Seized Materials was completed this past Saturday, October 8, 2022. Processing of the scanned documents took place over the holiday weekend and Bates numbers were applied today. Tomorrow, the government expects to “make available to Plaintiff and the Special Master [the Seized Materials as described above] . . . in electronic format with each page bearing a unique Bates number.” ECF 125, at 3. We understand that the Bates range is SM_MAL_00000000 to SM_MAL_00021792 (Seized Materials_Mar-a-Lago), for a total production of 21,792 pages.

To access electronic copies of the Seized Materials, Plaintiff’s counsel and the Special Master and his assistants – anyone who may access the Seized Materials under the Judicial Protective Order (ECF 113) – will need to provide the hosting vendor with their usernames and e-mail addresses. The government provided the hosting vendor’s point of contact to Plaintiff’s counsel on Wednesday, October 5, 2022, the same day that the government engaged the hosting vendor. The government is providing the hosting vendor’s point of contact to the Special Master’s courtroom deputy contemporaneously with this filing.

As soon as the government provides the spreadsheet and makes available the electronic copies of the Seized Materials, it will file the Notice of Completion. *See* ECF 125, at 3-4.

Thank you for your consideration.

Respectfully submitted,

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UNITED STATES ATTORNEY

MATTHEW G. OLSEN
Assistant Attorney General

By: /s/_____

JAY I. BRATT

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JULIE EDELSTEIN

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STEPHEN MARZEN

Trial Attorney

Counterintelligence and Export Control Section

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 11, 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.

/s/ Julie A. Edelstein

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