



U.S. Department of Justice

National Security Division

Counterintelligence and Export Control Section

Washington, D.C. 20530

October 24, 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 –
Joint Supplement to Log of Disputes

Dear Judge Dearie:

Plaintiff and the government’s Privilege Review Team (collectively, the “parties”) have resolved all outstanding attorney-client privilege disputes with respect to the materials segregated by the Privilege Review Team (the “Filter Materials”).¹ Specifically, in the interest of efficiently resolving such issues and avoiding unnecessary litigation, the parties offer the following:

Plaintiff withdraws his initial claims of attorney-client privilege and attorney work product doctrine with respect to the following Filter A and C Materials (referred to by document number and Bates ranges as set forth in the October 3, 2022 dispute log (DE:136)):

- Document 5 at A-006 to A-016
- Document 8 at A-023 to A-24 and A-27 to A-028
- Document 10 at A-031 to A-032
- Document 12 at A-034 to A-035
- Document 13 at A-041 to A-042
- Document 19 at A-065 to A-091
- Document 20 A-092 to A-098
- Document 21 at A-099 to A-137
- Document 22 at C-001

¹ Plaintiff previously did not assert attorney-client privilege or attorney work product doctrine with respect to the following Bates-numbered documents: A-001 to A-005; A-017 to A-022; A-025 to A-026; A-029 to A-030; A-033; A-036 to A-040; A-043 to A-058. (Docket Entry (DE) 138 at 1.) Those items were released to the government’s Case Team. (*Id.* at 2-3.)

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The parties agree that these materials can be provided immediately to the government's Case Team so that issues concerning executive privilege and the Presidential Records Act can be resolved. (*See* DE 138 at 1-2.)

The government, through its Privilege Review Team, agrees to handle Document 17 (Bates range A-59 to A-60) and Document 18 (Bates range A-061 to A-64) in the same manner as the Filter B Materials. (*See* DE:138 at 2-3.) Namely, the Privilege Review Team will return the originals to Plaintiff but maintain a control copy. (*See id.*)

In conclusion, the parties jointly and respectfully submit that all issues concerning attorney-client privilege and work product doctrine with respect to the Filter Materials have been resolved.

Respectfully submitted,

/s/Benjamin J. Hawk

Benjamin J. Hawk

Deputy Chief for Export Control and
Sanctions

National Security Division

950 Pennsylvania Avenue, NW

Washington, D.C. 20530

New Jersey Bar No. 030232007

Ph: (202) 307-5176

Email: benjamin.hawk@usdoj.gov

/s/Anthony W. Lacosta

Anthony W. Lacosta

Managing Assistant United States

Attorney - WPB

Court. No. A5500698

500 S. Australian Avenue (4th Floor)

West Palm Beach, Florida 33132

Ph: (561) 209-1015

Email: anthony.lacosta@usdoj.gov

Counsel for Plaintiff Donald J.

Trump

/s/ James M. Trusty

James M. Trusty

Ifrah Law PLLC

1717 Pennsylvania Ave. NW

Suite 650

Washington, D.C. 20006

Telephone: (202) 524-4176

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Email: jtrusty@ifrahlaw.com

/s/ Christopher M. Kise

Christopher M. Kise

Chris Kise & Associates, P.A.

201 East Park Avenue, 5th Floor

Tallahassee, FL 32301

Telephone: (850) 270-0566

Email: chris@ckise.net

/s/ M. Evan Corcoran

M. Evan Corcoran

SILVERMAN|THOMPSON|

SLUTKIN|WHITE, LLC

400 East Pratt Street – Suite 900

Baltimore, MD 21202

Telephone: (410) 385-2225

Email:

ecorcoran@silvermanthompson.com

/s/ Lindsey Halligan

Lindsey Halligan

Florida Bar No. 109481

c/o Ifrah Law PLLC

1717 Pennsylvania Ave., NW

Suite 650

Washington, DC 20006

Email: lindseyhalligan@outlook.com