



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”).<sup>1</sup> 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

---

<sup>1</sup> 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.)

Judge Raymond J. Dearie

October 24, 2022

Page 2

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 (4<sup>th</sup> 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

Judge Raymond J. Dearie

October 24, 2022

Page 3

Email: [jtrusty@ifrahlaw.com](mailto: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](mailto: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](mailto: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](mailto:lindseyhalligan@outlook.com)