

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

CASE NO. 22-81294-CIV-CANNON

DONALD J. TRUMP,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

_____ /

**PLAINTIFF'S SUPPLEMENTAL PLEADING
REGARDING SPECIAL MASTER NOMINATIONS**

On September 9, 2022, the above-captioned parties filed a joint submission to the Court regarding potential Special Master candidates proposed by each party. [ECF No. 83]. That submission indicated to the Court that our position on each other's candidates would be provided by September 12, 2022.

Plaintiff objects to the proposed nominees of the Department of Justice. Plaintiff believes there are specific reasons why those nominees are not preferred for service as Special Master in this case.

As the Court's Order [ECF No. 64] required a *list* of proposed Special Master candidates but did not specify whether that is to include specific

advocacy as to why certain nominees are or are not suitable to serve as Special Master, Plaintiff has construed that Order in a limited fashion.

Plaintiff also submits it is more respectful to the candidates from either party to withhold the bases for opposition from a public, and likely to be widely circulated, pleading. Therefore, Plaintiff asks this Court for permission to specifically express our objections to the Government's nominees only at such time that the Court specifies a desire to obtain and consider that information. Such information could then be provided *in camera* or pursuant to whatever procedure the Court deems most efficient and appropriate. Consistent with that approach, Plaintiff is willing to provide our specific rationale for supporting our nominees if and when the Court so orders.

Dated: September 12, 2022

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Respectfully submitted,

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Counsel for Plaintiff
Donald J. Trump

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 12, 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/ Christopher M. Kise
Christopher M. Kise