

**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

**Lindsey Halligan**  
Florida Bar No. 109481  
511 S.E. 5<sup>th</sup> Avenue  
Suite 1008  
Fort Lauderdale, FL 33301  
[Lindseyhalligan@gmail.com](mailto:Lindseyhalligan@gmail.com)

**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)  
(*pro hac vice*)

Respectfully submitted,

**By: /s/ Christopher M. Kise**  
**Christopher M. Kise**  
Florida Bar No. 855545  
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)

**James M. Trusty**  
Ifrah Law PLLC  
1717 Pennsylvania Avenue N.W.  
Suite 650  
Washington, DC 20006  
Telephone: (202) 524-4176  
Email: [jtrusty@ifrahlaw.com](mailto:jtrusty@ifrahlaw.com)  
(*pro hac vice*)

***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