

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

THE TRUMP ORGANIZATION  
LLC and DTTM OPERATIONS  
LLC,

*Plaintiffs,*

v.

**Case No. 8:25-cv-01962**

THE INDIVIDUALS,  
CORPORATIONS,  
LIMITED LIABILITY  
COMPANIES,  
PARTNERSHIPS, and  
UNINCORPORATED  
ASSOCIATIONS  
IDENTIFIED ON  
SCHEDULE A,

*Defendants.*

\_\_\_\_\_/

**MOTION FOR SPECIAL ADMISSION**

Plaintiffs, The Trump Organization LLC (“Trump Organization”) and DTTM Operations LLC (“DTTM”) (together, “Plaintiffs”), respectfully submit the following Motion for Special Admission of Plaintiffs’ counsel Katie Pearl Kavanaugh, *pro hac vice*. Pursuant to Local Rule 2.01(c), Plaintiffs state as follows:

1. Plaintiffs have retained Katie Pearl Kavanaugh of Boies Schiller Flexner LLP to represent them in the above-captioned case. Ms. Kavanaugh is not a Florida resident and is not a member of The Florida Bar.

2. Ms. Kavanaugh is a member in good standing with the State of New York Bar.

3. Ms. Kavanaugh's New York Bar registration number is 5782412. A Certificate of Good Standing from the State of New York Bar is attached hereto as Exhibit 1.

4. Ms. Kavanaugh has not abused the privilege of special admission by maintaining a regular law practice in Florida.

5. Ms. Kavanaugh has initially appeared in the last thirty-six months in the following case in a federal court in Florida: *Kaws, Inc. v. Printify Inc.*, No. 1:23-cv-24063-GAYLES (S.D. Fla. Aug. 23, 2024).

6. Ms. Kavanaugh will comply with the federal rules and this Court's local rules.

7. Ms. Kavanaugh is familiar with 28 U.S.C. § 1927, which provides:

Any attorney or other person admitted to conduct cases in any court of the United States or any Territory thereof who so multiplies the proceedings in any case unreasonably and vexatiously may be required by the court to satisfy personally the excess costs, expenses, and attorneys' fees reasonably incurred because of such conduct.

8. Ms. Kavanaugh has paid the fee for special admission or will pay the fee upon special admission and will register with the Court's CM/ECF system.

9. Ms. Kavanaugh affirms the oath, which states:

I will support the Constitution of the United States. I will bear true faith and allegiance to the government of the United States. I will maintain the respect due to the courts of justice and all judicial officers. I will well and faithfully discharge my duties as an attorney and officer of this Court. I will conduct myself uprightly and according to the law and the recognized standards of ethics of the legal profession.

/s/ Katie Kavanaugh  
Katie Kavanaugh

### **Local Rule 3.01(g) Certification**

Plaintiffs' counsel has not conferred with counsel for Defendants regarding this Motion because Defendants have not yet been served and are unavailable for service as Plaintiffs must first obtain the necessary contact information for Defendants.<sup>1</sup>

**WHEREFORE**, Movants respectfully request the entry of an order authorizing the *pro hac vice* appearance of Katie Pearl Kavanaugh as counsel of record in the above-captioned case.

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<sup>1</sup> Plaintiffs intend to file an *ex parte* Motion for Order Authorizing Alternate Service of Process to serve Defendants via email and website posting and an *ex parte* Motion for Temporary Restraining Order to obtain, among other relief, the emails needed to serve Defendants from the online marketplaces on which Defendants operate.

Dated: July 28, 2025

Respectfully submitted,

Katie Kavanaugh  
**BOIES SCHILLER FLEXNER LLP**  
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Los Angeles, CA 90067  
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kkavanaugh@bsfllp.com

By: /s/ Jason Hilborn  
Jason Hilborn (FBN 1008829)  
**BOIES SCHILLER FLEXNER LLP**  
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Fort Lauderdale, FL 33301  
Telephone: (954) 356-0011  
jhilborn@bsfllp.com  
*Attorneys for Plaintiffs*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 28th day of July, 2025, a true and correct copy of the foregoing, including exhibits, was filed with the Court's CM/ECF system.

By: /s/ Jason Hilborn  
Jason Hilborn (FBN 1008829)  
**BOIES SCHILLER FLEXNER LLP**  
401 East Las Olas Blvd,  
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Fort Lauderdale, FL 33301  
Telephone: (954) 356-0011  
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# EXHIBIT 1



*Appellate Division of the Supreme Court  
of the State of New York  
Third Judicial Department*

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*I, Robert D. Mayberger, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that*

*Katie Pearl Kavanaugh*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on July 28, 2020, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*



*In Witness Whereof, I have hereunto set  
my hand in the City of Albany on July  
21, 2025.*

*Robert D Mayberger*

*Clerk of the Court*



*State of New York  
Supreme Court, Appellate Division  
Third Judicial Department  
Admissions Office  
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*Robert D. Mayberger  
Clerk of the Court*

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*Anthony A. Moore  
Director of Attorney  
Admissions*

To Whom It May Concern:

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the Third Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

Robert D. Mayberger  
Clerk of the Court