

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.

_____/

PLAINTIFFS' DISCLOSURE STATEMENT
UNDER RULE 7.1, FEDERAL RULES OF CIVIL PROCEDURE,
AND LOCAL RULE 3.03

1. Is the filer a non-governmental corporate party or non-governmental corporation moving to intervene?

☐ No.

☒ Yes, and

- ☐ These parent corporations and publicly held corporations own 10% or more of the filer's shares: [].

- ☐ The filer has no parent corporation.
- ☒ No publicly held corporation owns 10% or more of the filer's shares.

2. Is the court's jurisdiction based on either 28 U.S.C. § 1332(a) or 28 U.S.C. § 1332(d)?

- ☒ No.
- ☐ Yes, and this is the name and citizenship of each person or entity whose citizenship is attributed to the filer:

a. Is the court's jurisdiction based on 28 U.S.C. § 1332(a) and the filer a limited liability company or other unincorporated entity?

- ☐ No.
- ☐ Yes, and the filer has identified each member and the citizenship of each member and, if a member is another unincorporated entity, each member of that entity and that member's citizenship, and so on.

b. Is the court's jurisdiction based on 28 U.S.C. § 1332(d) and the filer a limited liability company or other unincorporated entity?

- ☐ No.
- ☐ Yes, and the filer has identified citizenship in accord with 28 U.S.C. § 1332(d)(10).

c. Is the filer an insurer?

- ☐ No.
- ☐ Yes, and the filer has identified citizenship in accord with § 1332(c)(1).

d. Is the filer a legal representative?

- ☐ No.
- ☐ Yes, and the filer has identified citizenship in accord with 28 U.S.C. § 1332(c)(2).

e. Has the filer identified any corporation?

- ☐ No.
- ☐ Yes, and for each, the filer has identified citizenship in accord with 28 U.S.C. § 1332(c)(1).

f. Has the filer identified any natural person?

- ☐ No.
- ☐ Yes, and for each, the filer has identified citizenship in accord with the person's domicile, which does not necessarily correspond to the person's residence.

3. Is there any other person or entity that has or might have an interest in the outcome of the action, including any interested or potentially interested lawyer, association, firm, partnership, corporation, limited liability company, subsidiary, conglomerate, affiliate, member, and other identifiable and related legal entity?

- ☐ No.

- ☒ Yes. These additional persons and entities have or might have an interest in the outcome of the action:

Plaintiff:

Trump Organization LLC
DTTM Operations LLC

Counsel for Plaintiff:

Boies Schiller Flexner LLP
Jason Hilborn
Katie Kavanaugh (*pro hac vice* pending)

Defendants:

The individuals, corporations, limited liability companies, partnerships, and unincorporated associations identified on Schedule A

Counsel for Defendants:

Unknown

4. Might the outcome of this action affect any entity, not yet identified, with publicly traded shares or debt?

- ☒ No.
- ☐ Yes, and this is the entity: [].

5. Is this a bankruptcy action?

☒ No.

☐ Yes, and the debtor is [].

☐ Yes, and the members of the creditors' committee are [].

6. Is this a criminal case?

☒ No.

☐ Yes, and these persons are arguably eligible for restitution: [].

7. Is there an additional entity likely to actively participate in this action?

☒ No.

☐ Yes, and this is the entity: [].

8. Does the filer certify that, except as disclosed, the filer is unaware of an actual or potential conflict of interest affecting the district judge or the magistrate judge in this action, and the filer will immediately notify the judge in writing within fourteen days after the filer knows of a conflict?

☒ Yes.

Dated: July 28, 2025

Respectfully submitted,

Katie Kavanaugh
(*pro hac vice* pending)
BOIES SCHILLER FLEXNER LLP
2029 Century Park East,
Suite 1520
Los Angeles, CA 90067
Telephone: (213) 629-9040
kkavanaugh@bsfllp.com

By: /s/ Jason Hilborn
Jason Hilborn (FBN 1008829)
BOIES SCHILLER FLEXNER LLP
401 East Las Olas Blvd,
Suite 1200
Fort Lauderdale, FL 33301
Telephone: (954) 356-0011
jhilborn@bsfllp.com

Attorneys for Plaintiffs