

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.

_____ /

RENEWED MOTION FOR SPECIAL ADMISSION

Plaintiffs, The Trump Organization LLC (“Trump Organization”) and DTTM Operations LLC (“DTTM”) (together, “Plaintiffs”), respectfully submit the following Renewed 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 in good standing of The Florida Bar.

2. Ms. Kavanaugh is a member in good standing with the State of New York Bar and the United States District Court for the Northern District of Illinois.

3. Ms. Kavanaugh's New York Bar registration number is 5782412. Ms. Kavanaugh's Northern District of Illinois Bar number is also 5782412. A Certificate of Good Standing from the State of New York Bar is attached hereto as Exhibit 1. A Certificate of Good Standing from the United States District Court for the Northern District of Illinois is attached hereto as Exhibit 2.

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.¹

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.

¹ Plaintiffs filed an *ex parte* Motion for Order Authorizing Alternate Service of Process (Doc. 13) to serve Defendants via email and website posting and an *ex parte* Motion for Temporary Restraining Order (Doc. 14) to obtain, among other relief, the emails needed to serve Defendants from the online marketplaces on which Defendants operate.

Dated: August 4, 2025

Respectfully submitted,

Katie Kavanaugh
BOIES SCHILLER FLEXNER LLP
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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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of August, 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,
Suite 1200
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*

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
P.O. Box 7350, Capitol Station
Albany, NY 12224-0350

Robert D. Mayberger
Clerk of the Court

AD3AdmissionsOffice@nycourts.gov
<http://www.nycourts.gov/ad3/admissions>
(518) 471-4778

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

EXHIBIT 2

CERTIFICATE OF GOOD STANDING



United States of America

}ss. Katie Pearl Kavanaugh

Northern District of Illinois

I, Thomas G. Bruton , Clerk of the United States District Court
for the Northern District of Illinois,

DO HEREBY CERTIFY That Katie Pearl Kavanaugh
was duly admitted to practice in said Court on (07/31/2025)
and is in good standing as a member of the bar of said court.

Dated at Chicago, Illinois
on (08/01/2025)

Thomas G. Bruton , Clerk,

By: London McGarr
Deputy Clerk

A TRUE COPY-ATTEST
THOMAS G. BRUTON, CLERK
By: s/ LONDON MCGARR
DEPUTY CLERK
U.S. DISTRICT COURT, NORTHERN
DISTRICT OF ILLINOIS
August 1, 2025

