

**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-1962-TPB-AAS

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

Defendants.

_____/

PLAINTIFFS' MOTION TO UNSEAL

Plaintiffs, The Trump Organization LLC (“Trump Organization”) and DTTM Operations LLC (“DTTM”) (together, “Plaintiffs”), in connection with the Court’s Paperless Endorsed Order granting Plaintiffs’ Motion to Seal Under Local Rule 1.11(c)—entered July 31, 2025 (Doc. 7)—move this Court to unseal all documents that have been restricted/sealed on the Court docket and

return all portions of the Court file to the public records. As grounds to do so, Plaintiffs state as follows:

1. On July 31, 2025, Plaintiffs filed their *Ex Parte* Motion for Temporary Restraining Order (“Motion for TRO”) (Doc. 14) and *Ex Parte* Motion for Order Authorizing Alternate Service of Process on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3) and Memorandum of Law in Support (“Motion for Alternate Service”) (Doc. 13).

2. On August 1, 2025, the Court entered an *Ex Parte* Order granting Plaintiffs Motion for TRO (“TRO”) (Doc. 17). On August 4, 2025, the Court entered an *Ex Parte* Order granting Plaintiffs’ Motion for Alternate Service (“Alternate Service Order”) (Doc. 20). Upon receipt, Plaintiffs served the TRO on the requisite third-party providers to restrain Defendants’ financial accounts at issue.

3. After Plaintiffs confirmed the restraints of Defendants’ accounts, Plaintiffs served the Complaint, Summons, Schedule A, TRO, Alternate Service Motion, and all other papers entered onto the docket in this matter on each Defendant in this action on August 17, 2025, by (1) providing these documents along with the website address to Plaintiffs’ designated serving notice website to Defendants via email to the email accounts provided by the marketplace platforms and payment processors associated with each of the Defendant Internet Stores, and (2) posting a copy of all documents entered onto

the docket in this matter at the website: <http://trump-cases.com/case-25-cv-01962.html>.

4. Because Defendants' accounts have been restrained and Defendants have now been served, sealed pleadings in this matter are no longer necessary.

Plaintiffs therefore respectfully request that all sealed pleadings in this matter be unsealed and the portions of the docket relating to Plaintiffs' Schedule A, Motion for TRO, and Motion for Alternate Service—together with all other documents that have been restricted from the Court docket—be returned to the public portions of the Court file.

* * *

Local Rule 3.01(g) Certification

As of the filing of this Motion, no Defendant has appeared in this action. Because no opposing party has formally appeared, no conference was possible. Still, Plaintiffs' counsel certifies that as of this 22nd day of August, 2025, Plaintiffs are serving this Motion on Defendants—under the methods of service authorized in the Court's Alternate Service Order—in a good-faith effort to provide continued notice of Plaintiffs' Motions in this action and to provide the opportunity for Defendants to respond, oppose, or otherwise discuss this matter.

Dated: August 22, 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

CERTIFICATE OF SERVICE

I certify that on this 22nd day of August, 2025, a true and correct copy of the foregoing 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
jhilborn@bsfllp.com