

**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 FOR RELEASE OF BOND**

Plaintiffs, The Trump Organization LLC (“Trump Organization”) and DTTM Operations LLC (“DTTM”) (together, “Plaintiffs”), by and through undersigned counsel, respectfully move for an order directing the Clerk of the Court to release to Plaintiffs’ counsel the \$10,000.00 bond posted in this case on August 14, 2025, plus any accrued interest. In support, Plaintiffs respectfully refer the Court to the following Memorandum of Law.

**MEMORANDUM OF LAW**

**I. BACKGROUND**

On July 25, 2026, Plaintiffs initiated this lawsuit against Defendants

(Doc. 1), alleging claims of trademark infringement and counterfeiting, false designation of origin, and common law unfair competition.

On July 31, 2026, Plaintiffs filed an *ex parte* Motion for Temporary Restraining Order (Doc. 14), requesting, among other relief, a restraint of the Defendants' financial accounts pending the Court's final disposition of this action.

On August 1, 2026, this Court entered an Order Granting Plaintiffs' "*Ex Parte* Motion for Temporary Restraining" ("TRO") (Doc. 17). The TRO required Plaintiffs to post a bond of \$10,000 as security. TRO at 6, 10.

On August 14, 2025, in compliance with the TRO, Plaintiffs posted the requested bond (Doc. 29).

## **II. RELIEF REQUESTED**

By this Motion, Plaintiffs seek the entry of an order releasing to Plaintiffs' counsel the \$10,000.00 bond posted in this case on August 14, 2025, plus any accrued interest.

## **III. BASIS FOR RELIEF**

As set forth in the Court's Order Granting Plaintiffs' "Motion for Preliminary Injunction" ("PI") (Doc. 52), entered on September 25, 2025, "[t]he ten-thousand-dollar (\$10,000.00) bond posted by Plaintiffs shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated." PI at 16. As this Court entered a Final Default

Judgment and Permanent Injunction on March 30, 2026 (Doc. 82), this action has been resolved, and no Defendants have appeared to contest this matter.

#### **IV. CONCLUSION**

For the foregoing reasons, Plaintiffs respectfully request that the Court enter an order directing the Clerk to release to Plaintiffs' counsel the \$10,000.00 bond posted in this case on August 14, 2025, plus any accrued interest, and that the sum may be made payable to

Boies Schiller Flexner LLP  
2200 Corporate Boulevard, NW, Ste. 400  
Boca Raton, FL 33431

Plaintiffs are prepared if necessary to provide a copy of any Disbursement Order entered by the Court, along with a copy of a Boies Schiller Flexner TIN Certification Form, to this Court's Financial Section.

#### **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 10th day of April, 2026, Plaintiffs are serving this Motion on Defendants—under the methods of service authorized in the Court's Order authorizing alternate service of process (Doc. 20)—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: April 10, 2026

Respectfully submitted,

Katie Kavanaugh  
*(pro hac vice)*  
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*Attorneys for Plaintiffs*

### **CERTIFICATE OF SERVICE**

I certify that on this 10th day of April, 2026, a true and correct copy of the foregoing was filed with the Court's CM/ECF system.

By: /s/ David Costello  
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