

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROY COCKRUM, et al.,

Plaintiffs,

v.

DONALD J. TRUMP FOR PRESIDENT, INC.,
& ROGER J. STONE,

Defendants.

Case No. 1:17-cv-1370-ESH

**MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF ON BEHALF OF
CERTAIN BIPARTISAN CAMPAIGN OFFICIALS**

By this motion Mark Salter, Ben LaBolt, Howard Opinsky, Mindy Finn, and Hari Sevugan (collectively, “Bipartisan Campaign Officials”) seek leave to file an amicus brief in opposition to Defendants’ Motion to Dismiss. The motion is assented to by Plaintiffs. It likewise has the assent of Defendants, conditioned upon the allowance of their unopposed Motion for Extension of Time to File Reply Briefs (Docket No. 27).

In their proposed amicus brief, attached as Exhibit A, Bipartisan Campaign Officials assert that entry into the political arena — by working on, volunteering for, or donating to a campaign — cannot come at the price of a wholesale forfeiture of privacy. Otherwise political speech, which lies at the heart of the First Amendment and our system of government, will be chilled and the free exchange of ideas will be inhibited. These matters are pertinent to the motion before the Court because the Defendants have claimed, instead, that the First Amendment affords them absolute right to publish (or

coordinate with others to publish) the private emails of individuals involved in a campaign. That anomalous claim would have significant consequences, which Bipartisan Campaign Officials set forth for the Court on the basis of their respective experience.

RESPECTFULLY SUBMITTED,

MARK SALTER
BEN LABOLT
HOWARD OPINSKY
MINDY FINN
HARI SEVUGAN

By their attorney,

/s/M. Patrick Moore Jr.
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ORDER

Amici Mark Salter, Ben LaBolt, Howard Opinsky, Mindy Finn, and Hari Sevugan are hereby granted leave to file an amicus brief subject to the provisions of Local Civil Rule 7(o).

The Hon. Ellen Segal Huvelle
United States District Court Judge

Dated: