

**IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
IN AND FOR OKEECHOBEE COUNTY, FLORIDA
CIVIL DIVISION**

PRESIDENT DONALD J. TRUMP,

Plaintiff,

v.

CASE NO.: 22-CA-000246

MEMBERS OF THE PULITZER PRIZE BOARD, an unincorporated association, ELIZABETH ALEXANDER, ANNE APPLEBAUM, NANCY BARNES, LEE C. BOLLINGER, KATHERINE BOO, NEIL BROWN, NICOLE CARROLL, STEVE COLL, GAIL COLLINS, JOHN DANISZEWSKI, GABRIEL ESCOBAR, CARLOS LOZADA, KELLY LYTLE HERNANDEZ, KEVIN MERIDA, MARJORIE MILLER, VIET THANH NGUYEN, EMILY RAMSHAW, DAVID REMNICK, and TOMMIE SHELBY,

Defendants.

NOTICE OF PRODUCTION OF NON-PARTY

Pursuant to Fla. R. Civ. P. 1.351, please take notice that, after ten (10) days from the date of service of this notice, the undersigned will facilitate service of the attached subpoena directed to the following person who is not a party to this action, and whose address is as follows, to produce the items listed at the time and place specified in the subpoena.

NAME AND ADDRESS

**Stephen J. Adler
Columbia University Graduate School
of Journalism
701 Pulitzer Hall
2950 Broadway
New York, NY 10027**

DATE AND TIME

**February 10, 2025
at 11:00 a.m.**

[signatures on following page]

DATED: January 23, 2025

Respectfully submitted,

/s/ R. Quincy Bird

Jeremy D. Bailie (FBN 118558)

R. Quincy Bird (FBN 105746)

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Attorneys for Plaintiff, President Donald J. Trump

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 23, 2025, the foregoing was filed electronically using the Florida Courts E-Filing Portal and will be electronically served upon all counsel of record.

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Attorneys for Defendants

/s/ R. Quincy Bird

Attorney

UNOFFICIAL
DOCUMENT

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Defendants.

SUBPOENA DUCES TECUM WITHOUT DEPOSITION

(RECORDS MAY BE MAILED OR E-MAILED IN LIEU OF APPEARANCE)

THE STATE OF FLORIDA:

TO: **Stephen J. Adler**
Columbia University Graduate School of Journalism
701 Pulitzer Hall
2950 Broadway
New York, NY 10027

YOU ARE COMMANDED to appear at **Weber, Crabb & Wein, P.A. at 5453 Central Avenue, St. Petersburg, Florida 33710, on February 10, 2025, at 11:00 a.m.**, and to have with you at that time and place the following **or produce the documents via email to quincy.bird@webercrabb.com**:

SCHEDULE "A"

DEFINITIONS AND INSTRUCTIONS

For purposes of this Subpoena, the following definitions apply:

1. The terms "Document" or "Documents" mean any written, typed, printed, recorded or graphic material, however produced, reproduced or stored, including, but not limited to, all Electronic Data, notes, e-mails, memoranda, reports, Correspondence, Communications, contracts, bills, agreements, letters, messages, minutes, telegrams, memorandums, memorandums of conferences or telephone conversations, study list, compliance of data, papers, books, records, pictures, photographs, tapes and all other tangible things upon which are handwriting, typing, printing, drawing, representative, photostatic or other copies, magnetic or electronic impulse or other forms of communication is recorded or reproduced and all copies (except for identical copies) and drafts thereof. Any copy containing these, or any other alterations, notes or comments not included on any original shall not be deemed an identical copy but shall be deemed a separate document within the foregoing definition.

2. The terms "Communication," "Communications," and "Correspondence," which are included within the broader terms "Document" and "Documents" above, mean any statement or utterance, whether written or oral, made by one person to another or in the presence of another, or any document delivered or sent from one person to another, including, but not limited to, notes, electronic messages, e-mails, voice mail messages, text messages, instant/direct messaging or IM, (e.g., iMessages, Slack messages, Skype Messenger, FaceBook Messenger, Signal, WhatsApp etc.), tweets, X posts, social media posts, information stored on web pages or web servers, and database records.

3. The term "Electronic Data," which is included within the broader terms "Document" and "Documents" above, means any information, including files, documents, correspondence, communications, images, videos, metadata or any combination thereof stored, created, or used on any Electronic Storage Device, disk, tape (including backup tapes and other backup media), or other computer or digital storage medium, microfilm, microfiche, floppy, or any other storage or recording medium.

4. The term "produce" means to make available the documents requested herein—**in their native format, including all meta-data**—for inspection and copying and to separate such documents into the categories set forth in this request.

5. The term "relating to" means concerning, respecting, referring to, summarizing, digesting, embodying, demonstrating, reflecting, establishing, tending to establish, tending not to establish, evidencing, comprising, connected with, commenting on, responding to, disagreeing with, showing, describing, analyzing, representing, constituting, or including.

6. The term "Defendant" or "Defendants" means any or all of the following Persons, as well as any attorney or agent acting for on behalf of any or all of the following Persons: ELIZABETH ALEXANDER, ANNE APPLEBAUM, NANCY BARNES, LEE C. BOLLINGER, KATHERINE BOO, NEIL BROWN, NICOLE CARROLL, STEVE COLL, GAIL COLLINS,

JOHN DANISZEWSKI, GABRIEL ESCOBAR, CARLOS LOZADA, KELLY LYTLE HERNANDEZ, EDWARD KLIMENT, KEVIN MERIDA, MARJORIE MILLER, VIET THANH NGUYEN, EMILY RAMSHAW, DAVID REMNICK, and/or TOMMIE SHELBY.

7. The term “Person” shall mean any natural person, legal person, and/ or unincorporated association, including the attorneys and/or agents acting for on or the behalf thereof.

8. The term “You” or “Your” shall mean Stephen J. Adler, including but not limited to any Person acting for on the behalf of Stephen J. Adler.

9. If You decline to produce any Documents requested hereinafter on the basis of any privilege known in the law, You shall, at the time of production designated herein, as to each such Document, provide Plaintiff with the following written information pertaining to such Document:

- a. its date or, if not dated, the date it was prepared or received;
- b. the type of document (e.g., letter, memorandum, telegram, chart, photograph, reproduction);
- c. the author and addressee;
- d. its present location;
- e. the identity and address of the individual or person presently custodian thereof;
- f. a general description of its contents;
- g. the number of pages thereof;
- h. the identity of each person who received a copy of such document and the relationship of such person to you;
- i. whether such document contains or relates to facts or opinions, or both; and the exact nature of the privilege that you claim with respect to such document.

10. The words “and,” “or,” as well as “and/or” shall be interpreted in the most inclusive sense possible.

11. Unless otherwise specified, the applicable timeframe for these requests shall be from January 1, 2018 through August 1, 2022.

DOCUMENTS TO BE PRODUCED

1. Produce any and all Documents, memoranda, Communications, Correspondence, including but not limited to electronic mail, typed, or handwritten Correspondence, and/or Communications, between You and any Defendant relating to Your engagement and/or relating to Your work to review the work submitted by *The New York Times* and *The Washington Post* that jointly won the 2018 Pulitzer Prize in National Reporting.
2. Produce any and all Documents, memoranda, Communications, Correspondence, including but not limited to electronic mail, typed, or handwritten Correspondence, and/or Communications, between You and any Person who is not a Defendant

relating to Your engagement and/or relating to Your work to review the work submitted by *The New York Times* and *The Washington Post* that jointly won the 2018 Pulitzer Prize in National Reporting.

3. To the extent not already included in the foregoing requests, Produce any and all Documents, memoranda, Communications, Correspondence, including but not limited to electronic mail, typed, or handwritten Correspondence, and/or Communications, between You and any Person who was engaged or commissioned, or considered by any Person for engagement or commissioning, to review the work submitted by *The New York Times* and *The Washington Post* that jointly won the 2018 Pulitzer Prize in National Reporting.
4. All privilege logs for Documents that exist and are not being produced, including all information required by Item 9 in the Definitions and Instructions provided herein.
5. Your current resume and/or curriculum vitae.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. **You may mail, e-mail, or otherwise electronically transmit the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above.** You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

If you do not (1) appear as specified; (2) furnish the records instead of appearing as provided above; or (3) object to this subpoena, you may be in contempt of Court.

You are subpoenaed by the attorney whose name appears on this subpoena and unless excused from this subpoena by the attorney or Court, you shall respond to this subpoena as directed.

DATED: January 23, 2025

Respectfully submitted,

/s/ R. Quincy Bird

Jeremy D. Bailie (FBN 118558)

R. Quincy Bird (FBN 105746)

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Attorneys for Plaintiff, President Donald J. Trump