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29 August 2022

The Honorable Aileen Cannon
United States District Court for the Southern District of Florida
Paul G. Rogers Federal Building and U.S. Courthouse
701 Clematis Street
West Palm Beach, FL 33401

Re: Potential Special Masters, Case No. 22-81294-CIV-CANNON

Dear Judge Cannon:

In light of the news that you may choose to appoint a Special Master in the above-captioned case to address any potential issues of Executive Privilege, I write to respectfully bring four uniquely qualified experts in the field to your attention for your consideration. We are not advocating for or against the appointment of a Special Master and take no position on that question; we simply wish to let you know of their existence and expertise in this exceedingly esoteric corner of the law. Each of the below individuals—listed in alphabetical order and with only a current title to avoid any suggestion of ranking—is willing to serve as a Special Master should you request it, and they are all willing to fully abide by the terms of the appointment.

- Heidi Kitrosser, Professor of Law, Northwestern University Pritzker School of Law
- Mark J. Rozell, Dean, Schar School of Policy and Government, George Mason University
- Jonathan Shaub, Assistant Professor of Law, University of Kentucky Rosenberg College of Law
- Mitchel A. Sollenberger, Ph.D., Professor of Political Science, University of Michigan-Dearborn

I have also attached a curriculum vitae for each person and a copy of an *amici curiae* brief I submitted on their behalf to the U.S. Supreme Court in a previous case involving former President Trump's claims of Executive Privilege. It is this last fact—that these scholars have already accumulated and applied specific expertise and knowledge regarding issues surrounding a former President's claims of Executive Privilege in comparable circumstances—that we believe uniquely qualifies any of these individuals to ably serve you as a Special Master, should you choose to appoint one.

I remain at your disposal should you choose to discuss any of this in greater detail.

Sincerely,

A handwritten signature in black ink, appearing to read "Kel McClanahan". The signature is fluid and cursive, with the first name "Kel" being particularly prominent.

Kel McClanahan