

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	CASE NO. 23SC188947
	:	
DONALD JOHN TRUMP,	:	Judge: Scott McAfee
	:	
Defendant.	:	

SUPPLEMENT TO MOTION TO COMPEL DISCOVERY

President Trump hereby files as a supplement to his motion to compel the attached Exhibit 1.

Respectfully submitted,

Steven H. Sadow
STEVEN H. SADOW
Georgia Bar No. 622075
Lead Counsel for Defendant

260 Peachtree Street, N.W.
Suite 2502
Atlanta, Georgia 30303
404-577-1400
stevesadow@gmail.com

Jennifer L. Little
Jennifer L. Little
Georgia Bar No. 141596
Counsel for Defendant

400 Galleria Pkwy
Suite 1920
Atlanta, Georgia 30339
404-947-7778
jlittle@jllaw.com

CERTIFICATE OF SERVICE

I hereby certify I electronically filed the foregoing document with the Clerk of Court using Odyssey Efile Georgia electronic filing system that will send notification of such filing to all parties of record.

This 10th day of January, 2024.

/s/ Steven H. Sadow
STEVEN H. SADOW

EXHIBIT 1

LAW OFFICES OF NATHAN J WADE

VENDOR ID# VS0000076036

ATTENTION: Fulton County District Attorney's Office
136 Pryor Street
Atlanta, GA 30303

Project Title: Anti-Corruption Special Prosecutor

INVOICE #6

2000 Powers Ferry rd
Suite 110
Marietta, GA 30067

770-303-0700

Description	DATE COMPLETED	HOURS BILLED	Cost
Witness Interview	4/1/22	3 hrs @\$250	\$750.00
Travel out of State and Interview	4/4/22-4/5/22	20 hrs @250	\$5,000.00
Team Meeting w/Floyd : investigation and interview of witnesses	4/6/22-4/7/22	14 hrs @250	\$3,500.00
Witness Interviews and Capital meeting	4/11/22	8 hours @250	\$2,000.00
Team meeting and witness interviews	4/12/22	5 hrs @ \$250	\$1,250.00
Team Interview and investigation	4/13/22	8 hours @250	\$2,000.00
Witness Interviews South Georgia	4/14/22	8 hours @250	\$2,000.00
Witness Interviews South Georgia	4/15/22	8 hrs @250	\$2,000.00
Team meeting; Conf w/Jan 6; Research legal issues to prep interv	4/18/22-4/21/22	24 hrs @250	\$6,000.00
Research; Drafting, witness interviews	3422/22-4/26/22	21 hours @250	\$5,250.00
Travel out of State; Interview and Research	4/27/22-4/29/22	16 hrs @250	\$4,000.00
Total			\$33,750.00

***Due to billing restrictions this invoice has been significantly truncated

okay to pay
ATG

Submitted, this 29 day of April, 2022

Nathan J Wade

LAW OFFICES OF NATHAN J WADE

VENDOR ID# VS0000076036

ATTENTION: Fulton County District Attorney's Office
136 Pryor Street
Atlanta, GA 30303

Project Title: Anti-Corruption Special Prosecutor

INV# 8

INVOICE #8
2000 Powers Ferry rd
Suite 110
Marietta, GA 30067

770-303-0700

Description	DATE COMPLETED	HOURS BILLED	Cost
Select SPGJ	5/2/22	8 hrs @\$250	\$2,000.00
Team Meetings; Prep and Schedule interviews; Research	5/3/22-5/4/22	16 hrs @250	\$4,000.00
Strategic plan for SPGJ; Meeting with Judge; Investigation; Witness interview	5/9/22-5/11/22	24 hrs @250	\$6,000.00
SPGJ; Team Meeting; Meetings with opposing counsel re testimony	5/12/22-5/13/22	14 hours @250	\$3,500.00
Meeting with DA; Team meeting; Court appearance re SPGJ	5/16/22-5/18/22	24 hrs @ \$250	\$6,000.00
Travel to Athens; Conf with White House Counsel	5/23/22	8 hours @250	\$2,000.00
Motion re out of state witnesses; Research; team meetings; witness interview	5/24/22-5/26/22	24 hours @250	\$6,000.00
Review Subpoena; Conf with Opposing Counsel re testimony	5/27/22	8 hrs @250	\$2,000.00
Team meeting; Conf w/Jan B; SPGJ witness prep	5/31/22	8 hrs @250	\$2,000.00
Total			\$33,500.00

***Due to billing restrictions this invoice has been significantly truncated

Submitted, this 31 day of May, 2022

Nathan J Wade

okay to pay
ATG

LAW OFFICES OF NATHAN J WADE

VENDOR ID# VS0000076036

ATTENTION: Fulton County District Attorney's Office
136 Pryor Street
Atlanta, GA 30303

INVOICE #12

2000 Powers Ferry rd
Suite 110
Marietta, GA 30067

Project Title: Anti-Corruption Special Prosecutor

770-303-0700

Description	DATE COMPLETED	HOURS BILLED	Cost
SPGJ, interview with elector, negotiations with OA	9/1/22	8 hrs @\$250	\$2,000.00
Discovery, interview witnesses	9/2/22	8 hrs @250	\$2,000.00
SP'GJ; conf with OA re testimony	9/6/22	7 hrs @250	\$1,750.00
Witness Interviews; conf call DC ; team meeting	9/7/22-9/9/22	24 hours @250	\$6,000.00
Research and Review transcript testimony to prep for witness test	9/12/22	8 hrs @ \$250	\$2,000.00
SPGJ and Team Meetings	9/13/22-9/15/22	24 hours @250	\$6,000.00
Travel to meet with OA prep for test	9/16/22	5 hours @250	\$1,250.00
Team strategic meeting and Floyd meeting	9/19/22	8 hrs @250	\$2,000.00
SPGJ; conf with court	9/20/22-9/21/22	16 hrs @250	\$4,000.00
Review Disc docs; team brain drain	9/22/22-9/23/22	9 hours @250	\$2,250.00
SPGJ; Motion review; Atty Conf; Disc conf; meetings	9/26/22-9/28/22	24 hrs @250	\$6,000.00
SPGJ; Team Review and expectations for next steps	9/29/22-9/30/22	11 hours @ 250	\$2,750.00
		Total	\$35,000.00

***Due to billing restrictions this invoice has been significantly truncated

Submitted, this _30 day of _September, 2022

Nathan J Wade

okay to pay
ATG

LAW OFFICES OF NATHAN J WADE

VENDOR ID# VS0000076036

ATTENTION: Fulton County District Attorney's Office
136 Pryor Street
Atlanta, GA 30303

Project Title: Anti-Corruption Special Prosecutor

INVOICE #14

2000 Powers Ferry rd
Suite 110
Marietta, GA 30067

770-303-0700

Description	DATE COMPLETED	HOURS BILLED	Cost
Team interview meeting, Prep	11/7/22	8 hrs @\$250	\$2,000.00
Meetings with witnesses and interviews with OA	11/8/22	5 hrs @250	\$1,250.00
SPGJ; Discovery doc	11/9/22-11/10/22	16 hrs @250	\$4,000.00
SPGJ info session and prep	11/14/22	8 hr @250	\$2,000.00
SPGJ	11/15/22	8hrs @ \$250	\$2,000.00
Jan 6 meeting and Atty conf.	11/16/22	8 hrs @250	\$2,000.00
Interview with DC/White House	11/18/22	8 hrs @\$250	\$2,000.00
Wittiness interview and doc review	11/21/22	8 hrs @\$250	\$2,000.00
SPGJ	11/22/22	8 hrs @\$250	\$2,000.00
Meeting with OA re testimony prep	11/28/22	8 hrs @\$250	\$2,000.00
SPGJ	11/29/22	8 hrs @250	\$2,000.00
SPGJ	11/30/22	8 hrs @250	\$2,000.00
Total			\$25,250.00

***Due to billing restrictions this invoice has been significantly truncated

Please Note, this invoice covers November of 2022

Submitted, this _19 day of _January, 2023

Nathan J Wade

okay to pay
ATG