

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  
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stevesadow@gmail.com

Jennifer L. Little

Jennifer L. Little

Georgia Bar No. 141596

Counsel for Defendant

400 Galleria Pkwy  
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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 COMPLET ED	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 witnesss	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

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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 COMPLET ED	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	5/9/22-5/1 1/22	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 6; 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

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## 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 #12

2000 Powers Ferry rd  
Suite 110  
Marietta, GA 30067

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; <b>conf call DC</b> ; 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

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## 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 COMPLET ED	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

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