

The Honorable Marsha J. Pechman

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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

RYAN KARNOSKI, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

No. 2:17-cv-1297-MJP

**DEFENDANTS' NOTICE OF  
SPECIAL MASTER  
RECOMMENDATIONS**

1 On March 24, 2020, the Court proposed the appointment of a special a master to assist  
2 with select discovery issues. Order, Dkt. 466. On March 31, 2020, Defendants filed objections  
3 to the appointment of a special master. Dkt. 470. On April 2, 2020, the Court held a  
4 teleconference with the parties, during which the Court stated that it intended to move forward  
5 with the appointment of a special master. Hr’g Tr. 34:14. The Court named three individuals  
6 under consideration to be appointed special master: Martha Dawson; Molly Terwilliger; and  
7 James Donohue. *Id.* at 34:5–13. The Court also stated that, until it made its selection, Defendants  
8 could submit their own recommendations of individuals to serve as special master. *Id.* at 35:3–  
9 7.

10 Although Defendants maintain their objection to the appointment of a special master, if  
11 a special master is to be appointed, Defendants respectfully recommend the Court appoint  
12 Kristofer Bundy of Kulshan Law Group.

13 In addition, while Defendants do not consent to the appointment of any of the three  
14 individuals identified by the Court during the April 2 teleconference, Defendants specifically  
15 object to the appointment of James Donohue, based on certain statements he made in a recent  
16 article that give rise to, at a minimum, an appearance of bias against Defendants. *See*  
17 <https://slate.com/news-and-politics/2019/11/federalist-society-federal-judges-unethical.html>  
18 (November 12, 2019) (“For the past two years, we have watched in horror as the executive and  
19 legislative branches routinely violated democratic norms. . . . As the impeachment inquiry  
20 proceeds and obstructive conduct previously unimagined occurs every day, more eyes look to  
21 the judiciary for some anchor of normality.”).

22 Dated: April 6, 2020

Respectfully submitted,

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ANTHONY J. COPPOLINO  
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*/s/ Matthew Skurnik*  
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