

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

PEOPLE OF THE STATE OF NEW YORK, by LETITIA JAMES, Attorney General of the State of New York,

Petitioner,

-against-

THE TRUMP ORGANIZATION, INC.; DJT HOLDINGS LLC; DJT HOLDINGS MANAGING MEMBER LLC; SEVEN SPRINGS LLC; ERIC TRUMP; CHARLES MARTABANO; MORGAN, LEWIS & BOCKIUS, LLP; and SHERI DILLON,

Respondents.

Index No. 451685/2020

STIPULATION AND [PROPOSED] ORDER

WHEREAS, in this special proceeding, the People of the State of New York, by Letitia James, Attorney General of the State of New York (“OAG”), have sought judicial resolution with respect to an application to compel compliance with certain OAG subpoenas;

WHEREAS, this Court has made itself available to resolve matters as they have arisen among the parties, including during testimonial examinations;

WHEREAS, OAG has previously advised this Court that, because of the ongoing nature of the investigation set forth in the Verified Petition in this action (Docket No. 181) and the anticipated need for potential judicial resolution of additional issues, it would be beneficial for the Court to retain jurisdiction over this proceeding, and this Court kept the proceeding open;

WHEREAS, OAG recently issued subpoenas (the “Subpoenas”) to Donald J. Trump, Ivanka Trump, and Donald Trump, Jr., (together, the “Individual Trump Parties”) for testimony and documents “in connection with an investigation into the valuation of properties owned or

controlled by Donald J. Trump or the Trump Organization, or any matter which the Attorney General deems pertinent thereto”;

WHEREAS, a dispute has arisen between the OAG and the Individual Trump Parties regarding the Subpoenas;

WHEREAS, the Subpoenas to the Individual Trump Parties arise from the same ongoing investigation and facts alleged in the Verified Petition;

WHEREAS, the Verified Petition asked this Court to grant “such other and further relief as is just and proper”;

IT IS HEREBY STIPULATED AND AGREED that:

1. Donald J. Trump, Ivanka Trump, and Donald Trump, Jr. are added to this proceeding as Respondents.

2. The caption of this proceeding shall be amended, and the clerk is directed to amend the caption, as follows:

PEOPLE OF THE STATE OF NEW YORK, by LETITIA JAMES, Attorney General of the State of New York,

Petitioner,

-against-

THE TRUMP ORGANIZATION, INC.; DJT HOLDINGS LLC; DJT HOLDINGS MANAGING MEMBER LLC; SEVEN SPRINGS LLC; ERIC TRUMP; CHARLES MARTABANO; MORGAN, LEWIS & BOCKIUS, LLP; SHERI DILLON; DONALD J. TRUMP; IVANKA TRUMP; and DONALD TRUMP, JR.,

Respondents.

3. The Individual Trump Parties will make any motion to quash the Subpoenas or for related relief during the week of December 27, 2021, or upon entry of this Order, whichever is later.

4. OAG will oppose any motion to quash or for related relief within 14 days of the filing of the motion. OAG will file any cross motion to enforce its Subpoenas to the Individual Trump Parties, and will file any necessary amendments to the pleadings, simultaneously with the filing of any opposition to the motion to quash.

5. The Individual Trump Parties will file any reply on the motion to quash or for related relief and opposition to any cross motion to compel within 14 days of the filing of the opposition and cross motion.

6. OAG will file any reply on the cross motion within 7 days of the filing of the opposition to the cross motion.

Dated: New York, New York
December 30, 2021

STIPULATED AND AGREED:

LETITIA JAMES
Attorney General of the State of New York

By: Austin Thompson  Digitally signed by Austin Thompson
DN: cn=Austin Thompson, o=Office of the
New York State Attorney General, ou,
email=Austin.Thompson@ag.ny.gov, c=US
Date: 2021.12.30 10:54:01 -05'00'

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New York, New York 10005
(212) 416-8464

Counsel for the People of the State of New York

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6. OAG will file any reply on the cross motion within 7 days of the filing of the opposition to the cross motion.

Dated: New York, New York
December 30, 2021

STIPULATED AND AGREED:

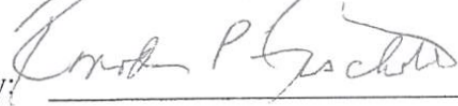
LETITIA JAMES
Attorney General of the State of New York

By: Austin Thompson  Digitally signed by Austin Thompson
DN: cn=Austin Thompson, o=Office of the
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email=Austin.Thompson@ag.ny.gov, c=US
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Counsel for the People of the State of New York

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By:  _____

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Counsel for Donald J. Trump

ALAN S. FUTERFAS

By:  _____

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Counsel for Ivanka Trump and Donald Trump, Jr.

SO ORDERED:



Hon. Arthur Engoron, J.S.C.
January 3, 2022