



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL
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NEW YORK, NY 10005

March 3, 2022

Hon. Arthur Engoron
Supreme Court, New York County
60 Centre Street
New York, NY 10007

RE: People by Letitia James, Attorney General v. The Trump Organization, et al.
(Index No. 451685-2020)

Dear Justice Engoron,

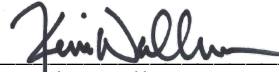
We write regarding the Court's Decision and Order, dated February 17, 2022. (Dkt. 654) On February 28, 2022, Donald J. Trump, Donald Trump, Jr. and Ivanka Trump (the "Trump Respondents") filed a notice of appeal. (Dkt. 656) In order to promote a swift resolution of this proceeding the parties have agreed to an expedited briefing schedule before the First Department. Pursuant to the terms of that stipulation, briefing will be completed by March 31, 2022. A copy of that Stipulation is attached as Exhibit 1. In addition, the Office of the Attorney General will request that the appeal be calendared and heard during the May Term.

In the interest of efficiency for both the parties and the court, and to allow time for the First Department to hear the appeal, we have therefore agreed to the attached Stipulation and Proposed Order to extend the time for the Trump Respondents to appear for testimony until two weeks after a decision by the First Department. (Attached as Exhibit 2) This extension would avoid the need for separate briefing over an application by the Trump Respondents for an interim stay during the pendency of the appeal. Given the expedited merits briefing we believe a stipulated extension of the testimony date will promote judicial economy without causing undue delay. The Stipulation and Proposed Order would also extend the date for the complete production of documents to March 31, 2022.

The parties are available for a conference if the Court would like to discuss the proposal in additional detail.

We thank the Court for its continued attention to this proceeding.

Respectfully submitted,



Keyin Wallace
Senior Enforcement Counsel
Division of Economic Justice