

**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,

Plaintiff,

v.

Index No. 452564/2022

DONALD J. TRUMP; DONALD TRUMP, JR.;
ERIC TRUMP; IVANKA TRUMP; ALLEN
WEISSELBERG; JEFFREY MCCONNEY;
THE DONALD J. TRUMP REVOCABLE
TRUST; THE TRUMP ORGANIZATION,
INC.; TRUMP ORGANIZATION LLC; DJT
HOLDINGS LLC; DJT HOLDINGS
MANAGING MEMBER; TRUMP
ENDEAVOR 12 LLC; 401 NORTH WABASH
VENTURE LLC; TRUMP OLD POST OFFICE
LLC; 40 WALL STREET LLC; and SEVEN
SPRINGS LLC,

Defendants.

**STIPULATION AND [PROPOSED] ORDER
MODIFYING PRELIMINARY INJUNCTION**

Plaintiff, People of the State of New York, by Letitia James, Attorney General of the State of New York ("Plaintiff" or "NYAG"), and Defendant Ivanka Trump ("Ms. Trump"), by and through her counsel, hereby stipulate and agree to, and request the Court to enter, the following modification to the Court's Decision and Order imposing a Preliminary Injunction and Appointment of an Independent Monitor against all defendants in the above-captioned action issued on November 3, 2022, NYSCEF No. 183, and entered on November 4, 2022, NYSCEF No. 184 (the "Preliminary Injunction Order") and all subsequent and supplemental orders related to the Preliminary Injunction Order:

1. The term "defendants" or "Defendants" as used in the Preliminary Injunction Order and all subsequent and supplemental orders related to the Preliminary Injunction Order, including the Monitorship Order and Supplemental Monitorship Order, excludes Ivanka Trump.

2. Ms. Trump shall promptly dismiss her appeal of the Preliminary Injunction Order.

Dated: December 1, 2022

Respectfully submitted,

LETITIA JAMES

Attorney General of the State of New York

By: 

Kevin C. Wallace

By: 

Reid M. Figel *(pro hac vice)*

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ATTORNEY GENERAL**

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*Attorney for the People of the State of
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Counsel for Defendant Ivanka Trump

SO ORDERED: 

Hon. Arthur F. Engoron, J.S.C.