

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.	:	

**MOTION TO ADOPT CO-DEFENDANT CHESEBRO’S GENERAL
DEMURRER TO COUNT ONE (RICO) FOR FAILURE TO ALLEGE
CONTINUITY**

President Trump hereby adopts the general demurrer timely filed by co-defendant Chesebro based on count one’s (RICO) failure to allege the continuity requirement of the alleged RICO pattern. Specifically, President Trump adopts Chesebro’s particularized arguments that, under H.J. Inc. v. Nw. Bell Tel. Co., 492 U.S. 229, 238 (1989), count one fails to allege “open-ended” and/or “closed-ended” continuity.

WHEREFORE, President Trump respectfully **ADOPTS** co-defendant Chesebro’s general demurrer to count one’s (RICO) failure to allege the continuity requirement .

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
404-577-1400
stevesadow@gmail.com

Jennifer L. Little
Jennifer L. Little
Georgia Bar No. 141596
Counsel for Defendant

400 Galleria Pkwy
Suite 1920
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 26th day of September, 2023.

/s/ Steven H. Sadow
STEVEN H. SADOW