

EXHIBIT “A”

From: "Hon. Arthur Engoron" <aengoron@nycourts.gov>
Date: February 22, 2024 at 11:37:05 AM EST
To: Clifford Robert <crobert@robertlaw.com>, "Amer, Andrew" <Andrew.Amer@ag.ny.gov>, "Wallace, Kevin" <Kevin.Wallace@ag.ny.gov>, chris kise <chris@ckise.net>, ckise@continentalpllc.com, Alina Habba <ahabba@habbalaw.com>, "Faherty, Colleen" <Colleen.Faherty@ag.ny.gov>, "Solomon, Louis" <Louis.Solomon@ag.ny.gov>
Cc: "Allison R. Greenfield" <argreenf@nycourts.gov>
Subject: RE: People v. Trump, et al., No. 452564/2022

Dear Mr. Robert,

You have failed to explain, much less justify, any basis for a stay.

I am confident that the Appellate Division will protect your appellate rights.

Justice Engoron

From: [Clifford Robert](#)
To: [Hon. Arthur Engoron](#)
Cc: [Amer, Andrew](#); [Wallace, Kevin](#); [chris kise](#); [ckise@continentalpllc.com](#); [Alina Habba](#); [Faherty, Colleen](#); [Solomon, Louis](#); [Allison R. Greenfield](#); [Michael Farina](#)
Subject: Re: People v. Trump, et al., No. 452564/2022
Date: Thursday, February 22, 2024 11:29:16 AM

Dear Justice Engoron:

We are in receipt of your email where the Court does not address the defendants’ request for a temporary stay of enforcement of the Judgment necessary to protect defendants’ appellate rights and ensure an orderly post judgment process.

As the Court is well aware, the Monitor that the Court appointed remains in place. As such there is no exigency or potential prejudice to the attorney general from a brief stay of enforcement of the Judgment. To the contrary the prejudice to the defendants is considerable.

Respectfully,

Clifford S. Robert
Robert & Robert PLLC

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On Feb 22, 2024, at 11:13 AM, Hon. Arthur Engoron <aengoron@nycourts.gov> wrote:

Dear Mr. Robert,

I have confirmed that the judgment that the Attorney General has proposed has been updated to correct the error regarding the starting date for Mr. Weisselberg’s pre-judgment interest.

However, there is no evidence in the record to corroborate your claim that the entity defendants’ addresses are incorrect. Conversely, there is ample evidence in the record that the correct address for the subject defendant entities is Trump Tower, 725 Fifth Avenue, New York, New York. NYSCEF Docs. Nos. 245, 264, and 268-271.

You have again asked for time to file a proposed counter-judgment again without explaining in what way the Attorney General’s proposed judgment is incorrect (except as dealt with above) and again without specifying how your proposed judgment would differ. The proposed judgment accurately reflects the spirit and letter of the February 16 Decision and Order.

Accordingly, I intend to sign the proposed judgment this morning and to send it to the Clerk for further processing.

Justice Engoron

From: Amer, Andrew <Andrew.Amer@ag.ny.gov>
Sent: Thursday, February 22, 2024 9:24 AM
To: Hon. Arthur Engoron <aengoron@nycourts.gov>
Cc: Allison R. Greenfield <argreenf@nycourts.gov>; Wallace, Kevin <Kevin.Wallace@ag.ny.gov>; Clifford Robert <crobert@robertlaw.com>; chris kise <chris@ckise.net>; ckise@continentalpllc.com; Alina Habba <ahabba@habbalaw.com>; Faherty, Colleen <Colleen.Faherty@ag.ny.gov>; Solomon, Louis <Louis.Solomon@ag.ny.gov>
Subject: RE: People v. Trump, et al., No. 452564/2022

Dear Justice Engoron:

Attached is a courtesy copy of OAG's brief letter response (NYSCEF No. 1695) to Defendants' letter (NYSCEF No. 1693). I am also attaching for the Court's convenience a Word and pdf version of Plaintiff's proposed judgment filed yesterday but with the agreed-upon correction to the pre-judgment interest accrual date for Mr. Weisselberg's disgorgement amount.

Respectfully,

Andrew Amer | Special Counsel

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Executive Division
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From: Amer, Andrew**Sent:** Wednesday, February 21, 2024 4:12 PM**To:** Hon. Arthur Engoron <aengoron@nycourts.gov>**Cc:** Allison R. Greenfield <argreenf@nycourts.gov>; Wallace, Kevin <Kevin.Wallace@ag.ny.gov>; Clifford Robert <crobert@robertlaw.com>; chris kise <chris@ckise.net>; ckise@continentalpllc.com; Alina Habba <ahabba@habbalaw.com>; Faherty, Colleen <Colleen.Faherty@ag.ny.gov>; Solomon, Louis <Louis.Solomon@ag.ny.gov>**Subject:** RE: People v. Trump, et al., No. 452564/2022

Dear Justice Engoron:

The judgment clerk has advised us that because the judgment will include both monetary and equitable relief, it needs to be signed by Your Honor rather than the clerk. *See* CPLR 5016(c). Accordingly, attached is a proposed judgment that OAG has slightly revised only to modify the caption to identify the location of the Court, change the title to "Judgment [Proposed]," add a final line instructing the Clerk to calculate the interest and enter judgment, and change the signature line. We will shortly refile this proposed judgment on NYSCEF under the document type "Judgment – (Proposed) Submit Judgment Per Judge's Decision." Once Your Honor has determined the final form of the judgment after considering any competing proposal from Mr. Robert to be submitted by 5pm today, we ask that Your Honor sign the judgment and request that the judgment clerk enter the

judgment on an expedited basis to avoid any potential undue delay.

Respectfully,

Andrew Amer | Special Counsel

New York State Office of the Attorney General

Executive Division

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From: Hon. Arthur Engoron <aengoron@nycourts.gov>

Sent: Wednesday, February 21, 2024 10:32 AM

To: Wallace, Kevin <Kevin.Wallace@ag.ny.gov>; Clifford Robert <crobert@robertlaw.com>; Alina Habba <ahabba@habbalaw.com>; ckise@continentalpllc.com; chris kise <chris@ckise.net>; Amer, Andrew <Andrew.Amer@ag.ny.gov>; Faherty, Colleen <Colleen.Faherty@ag.ny.gov>; Solomon, Louis <Louis.Solomon@ag.ny.gov>

Cc: Allison R. Greenfield <argreenf@nycourts.gov>

Subject: People v. Trump, et al., No. 452564/2022

[EXTERNAL]

Dear Mr. Robert,

I have compared the language of the Attorney General's proposed judgment to the language of my February 16, 2024 Decision and Order, and the former exactly tracks the latter (except for the addition of defendants' addresses and blanks for interest amounts).

Please let me know, by 5pm today, if you object in any specific ways, and how your counter-judgment would differ. Given the foregoing, I see no need for a motion or conference on this.

Justice Engoron

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