

PART 59 APR 08 2024

DISTRICT ATTORNEY  
COUNTY OF NEW YORK  
ONE HOGAN PLACE  
New York, N. Y. 10013  
(212) 335-9000



ALVIN L. BRAGG, JR.  
DISTRICT ATTORNEY

April 8, 2024

Hon. Juan M. Merchan  
New York State Supreme Court, Criminal Term, Part 59  
100 Centre Street  
New York, New York 10013

Dear Justice Merchan:

On April 5, 2024, defendant submitted a pre-motion letter seeking leave to file a motion to enforce certain requests of a subpoena *duces tecum* he claims was served on Stormy Daniels on March 18, 2024, with a return date of March 29, 2024. The People do not oppose defendant's proposed filing, but should the Court grant leave to file, the People respectfully request that the Court (1) set a five-page motion limit, and (2) grant the People the opportunity to respond one week after defendant files his motion. The People will fully brief their objections to the enforcement of the subpoena in their opposition.

Respectfully Submitted,

/s/ Matthew Colangelo

Matthew Colangelo

Christopher Conroy

Katherine Ellis

Susan Hoffinger

Becky Mangold

Joshua Steinglass

*Assistant District Attorneys*