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8 Attorneys for Defendants
9 ESSENTIAL CONSULTANTS, LLC and
10 MICHAEL COHEN

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 STEPHANIE CLIFFORD a.k.a.
14 STORMY DANIELS a.k.a. PEGGY
15 PETERSON, an individual,

16 Plaintiff,

17 v.

18 DONALD J. TRUMP a.k.a. DAVID
19 DENNISON, an individual,
20 ESSENTIAL CONSULTANTS, LLC, a
21 Delaware Limited Liability Company,
22 MICHAEL COHEN, an individual, and
23 DOES 1 through 10, inclusive,

24 Defendants.

Case No. 2:18-CV-02217-SJO-FFM

**DECLARATION OF MICHAEL D.
COHEN IN SUPPORT OF JOINT *EX
PARTE* APPLICATION FOR STAY**

Assigned for All Purposes to the
Hon. S. James Otero

Action Filed: March 6, 2018

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DECLARATION OF MICHAEL D. COHEN

I, Michael D. Cohen, declare as follows:

1. I have personal knowledge of the facts set forth herein, and if called and sworn as a witness, I could and would competently testify to the matters stated herein.

2. On April 9, 2018, the Federal Bureau of Investigation (“FBI”) executed three search warrants on my residence, office and hotel room, respectively, without any prior notice. During the corresponding raids, the FBI seized various electronic devices and documents in my possession, which contain information relating to the \$130,000 payment to Plaintiff Stephanie Clifford at the center of this case, and my communications with counsel, Brent Blakely, relating to this action.

3. Based upon the advice of counsel, I will assert my 5th amendment rights in connection with all proceedings in this case due to the ongoing criminal investigation by the FBI and U.S. Attorney for the Southern District of New York.

4. On April 10, 2018 I first realized that my Fifth Amendment rights would be implicated in this case, after I considered the events of April 9, 2018, described in the above paragraph 2.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 25, 2018, at New York, New York.

MICHAEL D. COHEN

