

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,

Petitioner,

-against-

THE TRUMP ORGANIZATION, INC.; DJT HOLDINGS LLC; DJT HOLDINGS MANAGING MEMBER LLC; SEVEN SPRINGS LLC; ERIC TRUMP; CHARLES MARTABANO; MORGAN, LEWIS & BOCKIUS, LLP; SHERI DILLON; DONALD J. TRUMP; IVANKA TRUMP; DONALD TRUMP, JR.; and CUSHMAN & WAKEFIELD INC.

Respondents.

Index No. 451685/2020

STIPULATION AND ~~PROPOSED~~ ORDER

Mo. Seq. 008

WHEREAS, on February 17, 2022 the Court entered a Decision and Order on Motion (Dkt. 654, the "Order"), directing Respondents Donald J. Trump, Donald Trump, Jr. and Ivanka Trump (the "Trump Parties") to appear for testimony within 21 days of the Order;

WHEREAS, the Trump Parties filed a Notice of Appeal on February 28, 2022 (the "Appeal");

WHEREAS, the Court entered a Stipulation and Order dated March 3, 2022 (Dkt. 660) directing that the Trump Parties "shall appear for testimony within 14 days of a decision by the First Department on the Appeal affirming the terms of the Order, absent a stay issued by the First Department or the New York Court of Appeals."

WHEREAS, on May 26, 2022 the First Department issued a decision affirming the terms of the Order; and

WHEREAS, the parties have agreed to additional time to allow for the orderly preparation for the testimony of the Trump Parties and to allow for consideration of any application to the Court of Appeals;

THEREFORE IT IS HEREBY STIPULATED AND AGREED that:

1. Respondents Donald J. Trump, Donald Trump, Jr., and Ivanka Trump shall appear for testimony commencing Friday, July 15, 2022 and concluding by the following week, absent a stay issued by the New York Court of Appeals.

2. Any application to the Court of Appeals for a stay of the Order by Respondents Donald J. Trump, Donald Trump, Jr., or Ivanka Trump shall be filed on or before June 13, 2022, with opposition papers to be filed within ten days of the Respondents' filing, and any reply papers shall be filed no later than June 30, 2022.

3. In the event that the New York Court of Appeals or any other state court ultimately determines that the Office of the Attorney General's ("OAG") subpoenas seeking testimony are not enforceable and that any testimony taken pursuant to paragraph 1 above, including any invocations made by the Trump Parties, cannot be used by the OAG in this or any other proceeding, OAG will take all necessary steps to comply with such an order.

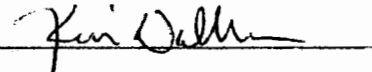
Dated: New York, New York

June 7, 2022

STIPULATED AND AGREED:

LETITIA JAMES


Attorney General of the State of New York

By: 

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New York, NY 10005

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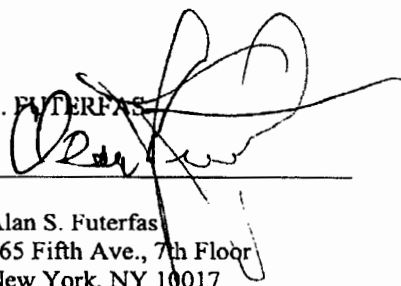
HABBA MADAIO & ASSOCIATES LLP

By: 

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Counsel for Donald J. Trump

ALAN S. FUTERFAS

By: 

Alan S. Futerfas
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New York, NY 10017

Counsel for Ivanka Trump and Donald Trump, Jr.

SO ORDERED:

6/8/2022



Hon. Arthur Engoron, J.S.C.