

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,

Index No. 452564/2022

**NOTICE OF MOTION**

Plaintiff,

vs.

DONALD J. TRUMP, DONALD TRUMP, JR., ERIC  
TRUMP, ALLEN WEISSELBERG, JEFFREY  
MCCONNEY, THE DONALD J. TRUMP  
REVOCABLE TRUST, THE TRUMP  
ORGANIZATION, INC., TRUMP ORGANIZATION  
LLC, DJT HOLDINGS LLC, DJT HOLDINGS  
MANAGING MEMBER, TRUMP ENDEAVOR 12  
LLC, 401 NORTH WABASH VENTURE LLC,  
TRUMP OLD POST OFFICE LLC, 40 WALL STREET  
LLC, and SEVEN SPRINGS LLC,

Defendants.

**PLEASE TAKE NOTICE** that, upon the annexed Affirmation of Bennet J. Moskowitz, Esq. dated October 19, 2023, together with the attached exhibits, and the Memorandum of Law dated October 19, 2023 and submitted herewith, and all prior pleadings and proceedings in this action, the undersigned, counsel for non-party Ivanka Trump (“Ms. Trump”), will move this Court at the Supreme Court of the State of New York, New York County, located at 60 Centre Street, New York, NY, 10007, Courtroom 418, before the Honorable Arthur F. Engoron, J.S.C. on November 6, 2023, or as soon thereafter as counsel can be heard, for an order:

- (1) Pursuant to CPLR 2304, quashing Subpoenas Ad Testificandum purportedly served by Plaintiff on non-parties TTT Consulting LLC, Ivanka OPO LLC, and 502 Park Project LLC; and
- (2) in the alternative, for a Protective Order pursuant to CPLR 3103; and

(3) For such other and further relief as this Court deems just and proper.

The undersigned tried in good faith to resolve this issue without court intervention but was unable to reach an agreement with the New York Office of the Attorney General.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to CPLR 2214(b), answering papers, if any, are required to be served upon the undersigned at least seven (7) days before the return date of this motion.

Respectfully submitted,

Dated: New York, New York  
October 19, 2023

**TROUTMAN PEPPER HAMILTON  
SANDERS LLP**



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BENNET J. MOSKOWITZ  
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New York, New York 10022  
(212) 704-6000

*Attorneys for Non-Party Ivanka Trump*

cc: Counsel of Record