FILED: NEW YORK COUNTY CLERK 11/21/2022 10:05 PM

NYSCEF DOC. NO. 195

INDEX NO. 452564/2022

RECEIVED NYSCEF: 11/21/2022

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,

Plaintiff,

VS.

DONALD J. TRUMP, DONALD TRUMP, JR., ERIC TRUMP, IVANKA 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.

Index No. 452564/2022

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying affirmation of Alina Habba, Esq. dated November 21, 2022, together with the exhibit annexed thereto, the accompanying Memorandum of Law dated November 21, 2022, and all prior papers and proceedings herein, defendants TRUMP ORGANIZATION, INC., TRUMP ORGANIZATION LLC and DONALD J. TRUMP, by their attorneys, Habba Madaio & Associates LLP, will move this Court, Supreme Court of the State of New York, County of New York, at the courthouse located at 60 Centre Street, Room 130, New York, New York 10007, on the 13th day of December 2022, at 9:30 a.m., or as soon thereafter as counsel may be heard, for an Order:

(a) pursuant to CPLR 3211(a)(1), (2), (3), (5) and (7), dismissing the Complaint of plaintiff PEOPLE OF THE STATE OF NEW YORK, BY LETITIA JAMES, Attorney General of the State of New York ("Plaintiff") (NYSCEF No. 1), in its entirety and with prejudice; and

FILED: NEW YORK COUNTY CLERK 11/21/2022 10:05 PM

NYSCEF DOC. NO. 195

RECEIVED NYSCEF: 11/21/2022

INDEX NO. 452564/2022

(b) granting all such other and further relief as this Court may deem just, equitable and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to CPLR 2214(b), Plaintiff shall

serve answering papers, if any, at least seven (7) days before the return date of this motion.

Dated: November 21, 2022 New York, New York

ALINA HABBA, ESQ.

MICHAEL T. MADAIO, ESQ.

HABBA MADAIO & ASSOCIATES LLP

1430 U.S. Highway 206, Suite 240 Bedminster, New Jersey 07921

-and-

 $112 \ West \ 34^{th} \ Street, \ 17^{th} \ and \ 18^{th} \ Floors$

New York, NY 10120 Phone: (908) 869-1188

E-mail: ahabba@habbalaw.com

Counsel for Donald J. 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 LLC, Trump Endeavor

12 LLC, 401 North Wabash Venture LLC,

Trump Old Post Office LLC, 40 Wall Street

LLC and Seven Springs LLC

To: Kevin C. Wallace, Esq.
Andrew Amer, Esq.
Colleen K. Faherty, Esq.
Alex Finkelstein, Esq.
Wil Handley, Esq.
Eric R. Haren, Esq.
Louis M. Solomon, Esq.
Stephanie Torre, Esq.
Office of the New York State Attorney General
28 Liberty Street
New York, New York 10005