

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 The Donald J. Trump Revocable Trust, DJT Holdings Managing Member, Trump Endeavor 12 LLC, 401 North Wabash Venture LLC by their attorneys, Continental PLLC and 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), (7), and (8) 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

- (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

/s/ Christopher M. Kise
CHRISTOPHER M. KISE
Pro Hac Vice
CONTINENTAL PLLC
101 North Monroe Street, Suite 750
Tallahassee, Florida 32301
(305) 677-2707
*Counsel for DJT Holdings LLC,
Trump Old Post Office LLC, 40 Wall
Street LLC and Seven Springs LLC*

-and-

ALINA HABBA
MICHAEL MADAIO
HABBA MADAIO &
ASSOCIATES LLP
112 West 34th Street,
17th & 18th Floors
New York, New York 10120
(908) 869-1188
*Counsel for DJT Holdings 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