

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 ALLEN WEISSELBERG and JEFFREY MCCONNEY, 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

(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 34th Street, 17th and 18th 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