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NYSCEF DOC. NO. 220

RECEIVED NYSCEF: 11/21/2022

INDEX NO. 452564/2022

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.

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NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying affirmation of Clifford S. Robert, 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 DONALD TRUMP, JR. and ERIC TRUMP, by their attorneys, Robert & Robert PLLC, 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.

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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: Uniondale, New York November 21, 2022

Respectfully submitted,

Clifford S. Robert CLIFFORD S. ROBERT

MICHAEL FARINA **ROBERT & ROBERT PLLC**

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Attorneys for Defendants Donald Trump, Jr. and Eric Trump

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