

LAW OFFICES
ROBERT & ROBERT PLLC

526 RXR PLAZA
UNIONDALE, NEW YORK 11566
(516) 832-7000
FACSIMILE (516) 832-7000

ONE GRAND CENTRAL PLACE
60 EAST 42ND STREET, SUITE 4600
NEW YORK, NEW YORK 10165*

(212) 858-9270
*NOT FOR MAIL OR SERVICE OF PROCESS

WWW.ROBERTLAW.COM

February 21, 2024

VIA NYSCEF

Hon. Arthur F. Engoron, J.S.C.
New York State Supreme Court
County of New York
60 Centre Street, Room 418
New York, New York 10007

Re: *People of the State of New York, et al. v. Donald J. Trump, et al.*,
Index No. 452564/2022 (Sup. Ct. New York County)

Dear Justice Engoron:

We write on behalf of all Defendants in response to the Court's e-mail of today's date, stating that the Court "see[s] no need for a motion or conference[.]" and directing Defendants to "let [the Court] know by 5pm today, if [Defendants] object in any specific ways, and how [Defendants] counter-judgment would differ." A copy of the Court's e-mail is annexed hereto as **Exhibit A**.

Defendants respectfully submit that the concerns raised in their letter of today's date about the Attorney General's unilateral submission of a proposed Judgment to the Clerk of the Court, stating that it is made "**on motion**," merit full compliance with the CPLR and the Uniform Civil Rules for the Supreme Court and the County Court. The Court's direction that it sees "no need for a motion or conference," because the proposed Judgment "exactly tracks the" February 16 Decision, ignores the fact that the proposed Judgment expressly states that a motion has been made, which is simply wrong. The Attorney General has not filed *any* motion on notice, nor moved to settle the proposed Judgment; her unseemly rush to memorialize a "judgment" violates all accepted practice in New York state court.

Should the Court decide that the standard processes set forth in the CPLR and the Uniform Civil Rules for the Supreme Court and the County Court do not apply in this case, and proceed to enter the Attorney General's proposed Judgment, Defendants request the Court stay enforcement of that Judgment for thirty (30) days. Given that the court-appointed monitor continues to be in place, there is no prejudice to the Attorney General in briefly staying enforcement to allow for an orderly post-Judgment process, particularly given the magnitude of Judgment.

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In addition, the Court should be aware of two errors in the proposed Judgment, which Defendants have thus far identified in the extremely limited time provided by the Court. First, the date on which interest begins to accrue for the Judgment against defendant Allen Weisselberg is January 9, 2023, not May 11, 2022. The Attorney General’s proposed Judgment seeks nearly eight (8) additional months of interest than that provided for in the February 16 Decision. Second, several of the addresses for the Defendants in the proposed Judgment are incorrect; set forth below is a chart containing the proper addresses for certain Defendants.

Entity Name:	Address:
Donald J. Trump Revocable Trust	1100 South Ocean Boulevard, West Palm Beach, FL 33480
DJT Holdings LLC	Trump National Golf Club Jupiter, 115 Eagle Tree Terrace, Jupiter, FL 33477
DJT Holdings Managing Member LLC	Trump National Golf Club Jupiter, 115 Eagle Tree Terrace, Jupiter, FL 33477
Trump Endeavor 12 LLC	Trump National Doral Miami, 4400 NW 87 th Avenue, Miami, FL 33178
401 North Wabash Venture LLC	Trump National Golf Club Jupiter, 115 Eagle Tree Terrace, Jupiter, FL 33477
Trump Old Post Office LLC	Trump National Golf Club Jupiter, 115 Eagle Tree Terrace, Jupiter, FL 33477

Lastly, at 4:23 p.m., the Attorney General e-filed a “slightly revised” proposed Judgment (NYSCEF No. 1692), which purports to make certain changes based upon advice that she received from the “judgment clerk.” Given that Defendants only received the revised proposed Judgment a few moments ago, we have not had a chance to review it. However, the “slightly revised” proposed Judgment only further serves as proof that the Attorney General’s rush to memorialize a “judgment” violates all accepted practice in New York state court and is intended to prejudice Defendants.

Defendants reiterate their request that the Court set a return date for the proposed Judgment that affords Defendants sufficient time to submit a proposed counter-Judgment.

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Should the Court have any questions, please feel free to contact me.

Respectfully submitted,

ROBERT & ROBERT PLLC

Clifford S. Robert

CLIFFORD S. ROBERT

cc: All Counsel of Record