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March 21, 2024

VIA NYSCEF

The Honorable Susanna Molina Rojas
Clerk of the Court
Supreme Court of New York
Appellate Division, First Department
27 Madison Avenue
New York, NY 10010

Re: People v. Donald J. Trump, et al., Case Nos. 2024-01134, 2024-01135

Dear Ms. Rojas:

On March 20, 2024, the Attorney General filed a letter seeking leave to file a “proposed surreply” to address Defendants’ reply affirmations because they, according to her wrongful filing, raise supposedly new arguments. March 20, 2024 Letter, at 1. That request should be rejected. The practice rules of the Appellate Division do not authorize the filing of surreplies. 22 N.Y.C.R.R. § 1250.4. Moreover, the reply Affirmations of Mr. Giulietti and Mr. Garten contain only new information addressing the unjust and impractical bond demand that was not available at the time Defendants filed their opening brief. They are directly responsive to unconstitutional and incorrect arguments raised in the Attorney General’s response brief. Given the complexity of these issues, we respectfully renew our request for oral argument and an interim stay pending decision on the stay motion.

Respectfully submitted,

ROBERT & ROBERT PLLC


CLIFFORD S. ROBERT

cc: All Counsel of Record (by NYSCEF)