



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES  
ATTORNEY GENERAL

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DIVISION OF APPEALS & OPINIONS

March 20, 2024

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. Trump*, No. 2024-01134, 2024-01135

Dear Ms. Rojas:

Pursuant to 22 N.Y.C.R.R. § 1250.4, on behalf of respondent People of the State of New York, by Letitia James, Attorney General of the State of New York (OAG), I write to respectfully request permission to file a surreply to defendants' motion for a stay pending appeal. OAG's proposed surreply would address the new factual allegations and new legal arguments raised for the first time in the reply affirmations of Gary Giulietti and Alan Garten and the reply memorandum of law in support of defendants' stay motion.

Sincerely,

Dennis Fan  
Senior Assistant Solicitor General  
(212) 416-8921