

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,

-against-

DONALD J. TRUMP, DONALD TRUMP, JR.,
ERIC TRUMP, ALLEN WEISSELBERG,
JEFFREY MCCONNEY, THE DONALD J.
TRUMP REVOCABLE TRUST, THE TRUMP
ORGANIZATION, INC., THE 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

Hon. Arthur F. Engoron

AFFIRMATION OF URGENCY

DAVID H. PIKUS, an attorney duly admitted to practice law before the Courts of the State of New York, hereby affirms the following statements to be true under the penalties of perjury:

1. I am a principal of the law firm of Bressler Amery & Ross P.C., the attorneys for non-party Knight Specialty Insurance Company (“KSIC”). I am fully familiar with the facts and circumstances set forth herein based on the files and materials maintained by my firm.

2. I submit this Affirmation of Urgency in support of the joint application of KSIC and Defendants (together with KSIC, the “Movants”), pursuant to CPLR §§ 2506 and 2507, to: (a) justify KSIC as surety on the undertaking, upon the ground that said surety is duly qualified to act as such; (b) set aside the Notice of Exception to Surety as filed by the Attorney General of the State of New York (“Plaintiff” or “NYAG”) on April 4, 2024; and (c) award costs incurred by this application.

3. Movants make this application by order to show cause given that this Court proposed a hearing on the sufficiency of the undertaking for April 22, 2024, one week from today's date. Consequently, an expedited briefing schedule is required.

4. No prior application has been made for the relief sought herein.

Dated: New York, New York
April 15, 2024



DAVID H. PIKUS