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## BY E-MAIL

Hon. Juan M. Merchan  
Judge - Court of Claims  
Acting Justice - Supreme Court, Criminal Term, Part 59  
100 Centre Street  
New York N.Y. 10013

Re: *People v. Donald J. Trump*, Ind. No. 71543-23

Dear Justice Merchan:

We respectfully submit this pre-submission letter pursuant to the Court's March 8, 2024 order.

On March 10, the People served *Sandoval* Notice on the defense. In it, they stated an intention to question President Trump, if he testifies, about thirteen different court determinations, as well as about most of the underlying facts leading to those determinations. We will be moving to preclude the People from asking about these items and will seek a *Sandoval* hearing. We ask that the Court permit us to submit a brief addressing why, under *Sandoval* and its progeny, the People should be precluded from cross-examining President Trump about the items listed in the People's *Sandoval* Notice. Given the recent adjournment, we respectfully request that we be allowed to file that brief ten days before the re-scheduled trial date.

At the Court's discretion, we will also be prepared to address the *Sandoval* scheduling issue at Monday's court conference.

Respectfully submitted,

/s/

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Cc: ADA Matthew Colangelo  
ADA Christopher Conroy  
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