

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK,

- against -

DONALD J. TRUMP,

Defendant.

Ind. No. 71543-23

**PRESIDENT DONALD J. TRUMP'S MOTION TO COMPEL
COMPLIANCE WITH SUBPOENA *DUCES TECUM* TO STEPHANIE CLIFFORD**

President Donald J. Trump respectfully submits this memorandum of law in support of his motion to compel compliance with the subpoena *duces tecum* issued to Stephanie Clifford, a/k/a “Stormy Daniels,” on March 18, 2024. For the reasons set forth below, DANY’s star witness should not be permitted to flout the Court’s jurisdiction, and the Court should compel Clifford to produce materials responsive to the subpoena, as modified herein, relating to (1) the bias, motive, and hostility reflected by the timing and content of Clifford’s documentary, and (2) Clifford’s communications with other DANY witnesses, such as Michael Cohen, and hearsay declarants, such as E. Jean Carroll, which have been publicly confirmed to exist.¹

RELEVANT FACTS

On March 30, 2023, a New York County grand jury returned an Indictment charging President Trump with 34 felony counts of falsifying business records in violation of Penal Law § 175.10. In an accompanying Statement of Facts, DANY alleged that, in or around October 2016, “Lawyer A” (subsequently identified as Michael Cohen) paid “Woman 2” (subsequently identified as Stephanie Clifford) \$130,000 to silence false allegations that she had a sexual encounter with President Trump several years prior. *See* Statement of Facts ¶ 21. [REDACTED], and Clifford has publicly stated that she is willing and expects to testify at the upcoming trial.²

In recent months, Clifford has repeatedly made false and misleading extrajudicial statements about the evidence in this case, has wrongly attacked President Trump’s character and leading candidacy in the 2024 Presidential election, and has specifically sought to exploit her status

¹ In light of recent productions by the U.S. Attorney’s Office for the Southern District of New York concerning Clifford, President Trump withdraws Request 3 of the subpoena *duces tecum*.

² *See, e.g.,* Graham Kates, *Stormy Daniels says she’s “set to testify” in Trump’s New York criminal trial in March*, CBS NEWS (Jan. 15, 2024), <https://www.cbsnews.com/news/stormy-daniels-testify-trump-new-york-criminal-trial>.

as a key witness in DANY’s prosecution of President Trump. Clifford launched a weekly podcast in December 2023, touting herself as “a witness for the prosecution against former president Donald Trump” looking to “bring you the real tea from my life and trials.”³ In the following weeks, Clifford released at least seven podcasts wherein she spoke about President Trump, DANY’s case, and his leading candidacy for President. For example, in a January 11, 2024 podcast, Clifford stated:

[He] is going to be the GOP nominee for president. Not only that, but the fucker’s winning! Somehow, he has convinced people that what he did was not so bad, that their lives are better when he was president, and they should just put him back in power, even if that means doing it from jail. But I am here to bear witness against that fact. That the man is indeed a monster. That the people who do his bidding are in fact evil, and his ride or die followers are fucking insane.⁴

Although the recordings of Clifford’s weekly podcasts have recently and conspicuously been pulled down from various platforms, Clifford cannot simply take back her statements or pretend that they were never made. In reality, she has made repeated false statements concerning the allegations underlying this case and has sought to demean President Trump, his defense, and his presidential campaign. Her statements are revealing of her motives in testifying against President Trump and the strength of her animosity of him—she is plainly seeking to promote her brand and make money based on her status as a witness in this case.

Clifford’s comments about President Trump and this case have been so inappropriate that DANY reportedly admonished her, as she explained on her podcast: “I’ve been asked to kind of

³ @thestormydaniels, INSTAGRAM (Dec. 6, 2023), <https://www.instagram.com/thestormydaniels/p/C0iCh9cskfu/?hl=en>; Beyond the Norm With Stormy Daniels by Audio Up, AMAZON, <https://www.amazon.in/BEYOND-NORM-STORMY-DANIELS/dp/B0CP2WJ6SL>.

⁴ Beyond the Norm with Stormy Daniels, *Writer Amanda Moore Spent 11 Months Undercover With the Far Right* (Jan. 11, 2024).

behave. I'm biting my tongue so fucking hard right now.”⁵ However, during an April 2023 interview, in response to a question about this case, Clifford stated, “For my own sake, I'd like vindication, I'd like him to get what's coming for once.”⁶

Kathy Griffin, a close friend and guest of Clifford on her podcast, has also exposed a long-standing text chain with Clifford and E. Jean Carroll, who [REDACTED]:

[L]et's be really honest because we are both friends with her. But I can say it even if you can't. We are on a text chain with E. Jean Carroll . . . It's a text chain I'm very proud of. But let's face it Trump said almost word for word the same things about you as he said about E. Jean. . . . Thank God the jury went her way. I think the tide is already turning for you.⁷

Griffin more recently elaborated on another podcast that she and Clifford communicate with Carroll “daily.”⁸ Griffin added: “And let me tell you, as someone who the feds have actually come after, I really hope they don't ever subpoena that text chain. . . . We don't go easy. We don't even call Trump ‘him.’ We call him ‘it.’ . . . Yeah, we're hardcore.”

Further compounding the prejudicial effects of Clifford's extrajudicial statements and anticipated testimony, Clifford worked with NBCUniversal to release a “documentary” entitled “Stormy,” which was released on March 18, 2024, the eve of the then-scheduled trial. A trailer for the documentary begins with video of Clifford describing herself as being “out of fucks” and

⁵ Beyond the Norm with Stormy Daniels, *Stormy and Kathy Griffin Are Not Sorry* (Feb. 6, 2024).

⁶ AJ McDougall, *Stormy Daniels Recalls Trump in That Hotel Room: ‘Put Your Clothes On’*, DAILY BEAST (Apr. 4, 2023, 10:45 pm), <https://www.thedailybeast.com/stormy-daniels-opens-up-about-nevada-hotel-encounter-with-donald-trump-to-vogue>.

⁷ Beyond the Norm with Stormy Daniels, *Stormy and Kathy Griffin Are Not Sorry* (Feb. 6, 2024).

⁸ Benjamin Lindsay, *Kathy Griffin Says She's on a Group Text With Mary Trump, Stormy Daniels, E. Jean Carroll: ‘I Really Hope the Feds Don't Subpoena That,’* THE WRAP (Apr. 3, 2024), <https://www.thewrap.com/kathy-griffin-mary-trump-stormy-daniels-e-jean-carroll-trump-texts/>.

an “idiot who can’t keep her mouth shut.”⁹ The trailer includes highly prejudicial video of Clifford claiming to be “terrified” after President Trump won the Republican nomination, of her reading threats from persons with no relation to this case, and of a male associate claiming that persons with no connection to President Trump tried to bring “guns” and “knives” into Clifford’s events. The trailer ends with Clifford claiming that she “won’t give up” because she is “telling the truth.” DANY has also disclosed that [REDACTED]

[REDACTED] Ex. 1.

On March 11 and 12, 2024, defense counsel sent a subpoena *duces tecum* to Clifford’s attorney, seeking the production of documents relating to the “Stormy” documentary and Clifford’s communications with potential witnesses and hearsay declarants in this proceeding. Clifford’s attorney did not respond. *See* Ex. 2.

On March 18, 2024, President Trump effected personal service on Clifford in Brooklyn, New York, as she attended a premiere event for her documentary. *See* Exs. 3, 4 & 5. Defense counsel emailed a courtesy copy of the subpoena to Clifford’s counsel on March 20, 2024. Ex. 6. Her counsel responded on the same day, falsely claiming that Clifford “was not served any papers.” Ex. 7. Clifford’s counsel subsequently wrote to Your Honor on April 9, 2024, claiming that Clifford “does not reside in the State of New York,” “disputes that the subpoena was ever ‘served’ upon her,” and “is not in possession of the subpoena or the check.” Ex. 8 at 1.¹⁰

APPLICABLE LAW

The CPL provides that an attorney for a criminal defendant “may issue a subpoena of [a criminal] court, subscribed by himself, for the attendance in such court of any witness whom the

⁹ Peacock, *Stormy: Official Trailer*, YOUTUBE, at 0:06 & 1:47 (Mar. 7, 2024), https://www.youtube.com/watch?v=_tE7h_TJkxg.

¹⁰ Clifford’s counsel “request[ed]” that the subpoena be quashed.

defendant is entitled to call in such action or proceeding.” CPL § 610.20(3). “A subpoena may be served by any person more than eighteen years old. Service must be made in the manner provided by the civil practice law and rules for the service of subpoenas in civil cases.” CPL § 610.40. All of the methods of CPLR § 308 are available for subpoena service, including by personal service. CPLR § 2303; *id.* § 308(1).

A subpoena is appropriate where the “evidence sought is reasonably likely to be relevant and material to the proceedings, and the subpoena is not overbroad or unreasonably burdensome.” CPL § 610.20(4). “The relevant and material facts in a criminal trial are those bearing upon ‘the unreliability of either the criminal charge or *of a witness upon whose testimony it depends.*’” *People v. Kozlowski*, 869 N.Y.S.2d 848, 903 (2008) (emphasis added) (quoting *People v. Gissendanner*, 48 N.Y.2d 543, 550 (1979)). “[A]ccess must be afforded . . . , for example, when a request . . . is directed toward revealing specific biases, prejudices or ulterior motives of the witness as they may relate directly to issues or personalities in the case at hand.” *Gissendanner*, 48 N.Y.2d at 548 (cleaned up).

DISCUSSION

I. The Subpoena *Duces Tecum* Was Properly Served On Clifford

Personal service of the subpoena issued to Clifford was made on March 18, 2024, as she arrived at a venue called “3 Dollar Bill” in Brooklyn, New York, for a premiere event relating to her documentary. Despite Clifford’s efforts to resist service at the premiere, and her counsel’s false representations that no papers were served, personal service was completed when the process server identified Clifford, apprised of her of the documents and service, and the documents were laid before her after she resisted service. Ex. 4.

“Personal service upon a natural person shall be made by . . . delivering the [subpoena] within the state to the person to be served.” CPLR § 308(1); *see also Lieberman v. Warner*, 66 Misc. 2d 731, 733 (Civ. Ct. N.Y. Cnty. 1971) (personal service was properly effected on nonresident while attending Civil Court, Bronx County); *Pearson Educ., Inc. v. Kumar*, 721 F. Supp. 2d 166, 182-83 (S.D.N.Y. 2010) (service of process on resident of India, while he was in New York City, was effective under CPLR § 308(1)). It is well established that “delivery of a [subpoena] may be accomplished by leaving it in the ‘general vicinity’ of a person to be served who ‘resists’ service.” *Bossuk v. Steinberg*, 58 N.Y.2d 916, 918 (1983); *see also Gammon v. Advanced Fertility Servs., P.C.*, 189 A.D.2d 561, 561 (1st Dep’t 1993) (“We [] find that valid personal service was made . . . when the process server left the papers in [person’s] general vicinity after he resisted service.”); *Carver Fed. Sav. Bank v. Shaker Gardens, Inc.*, 135 A.D.3d 1212, 1213 (3d Dep’t 2016) (“If a [person] resists service of process, service may be effected pursuant to CPLR 308(1) by leaving a copy of the summons in the [person’s] general vicinity, provided that the [person] is made aware that this is being done.” (quoting *Hall v. Wong*, 119 A.D.3d 897, 897 (2d Dep’t 2014))); *Miske v. Maher*, 156 A.D.2d 986 (4th Dep’t 1989) (“Whether defendant’s employees agreed or refused to accept service is irrelevant because the delivery requirement may be met by leaving the summons in the general vicinity of a person who resists service.”); *Matticore Holdings, LLC v. Hawkins*, 76 Misc. 3d 511, 514-15 (Civ. Ct. Bronx Cnty. 2022) (“The starting point in the analysis is the ‘black-letter law’ principle that ‘where the defendant resists service, it suffices to leave the summons in his general vicinity.’” (citing cases)).

As demonstrated by the sworn affidavits of the process sever, personal service was made on Clifford on March 18, 2024, and was properly effected. *See Nazarian v. Monaco Imports, Ltd.*, 255 A.D.2d 265, 266 (1st Dep’t 1998) (“A process server’s affidavit is prima facie evidence of

proper service sufficient to withstand a naked denial of receipt of service.”); *Fairmount Funding Ltd. v. Stefansky*, 235 A.D.2d 213, 214 (1st Dep’t 1997) (process server’s affidavits constituted prima facie evidence of proper service, and appellants’ “bald assertion that they never received process was insufficient to dispute the veracity or content of the affidavits”); *see also Manhattan Sav. Bank v. Kohen*, 231 A.D.2d 499, 500 (2d Dep’t 1996) (process server’s affidavit constituted prima facie evidence of proper service, and appellant’s “conclusory denial of service was insufficient to dispute the veracity or content of the affidavit”).

The process server has specifically sworn as follows, providing prima facie evidence of proper service:

- He is over the age of 18 years and not a party to or otherwise interested in this matter.
- He personally served Clifford with the subpoena on March 18, 2024, at 5:54 p.m., at 3 Dollar Bill, 260 Meserole Street, Brooklyn, New York 11206.
- He identified Clifford as she was walking up to the venue and advised her of the subpoena and why he was there.
- He read the case caption information of the subpoena to Clifford and presented the paperwork to her.
- Clifford declined the papers and he thereafter left them at her feet in her presence, at which time he stated to Clifford that she was served as he had identified her and explained to her what the documents were.

Ex. 4. A photo was taken of Clifford by the process server as she walked into the venue.



Ex. 5. Media coverage and photos of Clifford that night also corroborate the fact that it was her. *See* Ex. 9.

Clifford's conclusory and unsworn claims to the contrary do not overcome this showing and the presumption of proper service. *See Aames Cap. Corp. v. Ford*, 294 A.D.2d 134 (1st Dep't 2002) ("conclusory claims of improper service are insufficient to rebut the prima facie showing of service made out by the process server's affidavits"); *Bank of New York Mellon for Certificateholders of the CWABS, Inc., Asset-Backed Certificates, Series 2007-10 v. Salahuddin*, 60 Misc. 3d 999, 1003 (City Ct. Dutchess Cnty. 2018) ("A sworn non-conclusory denial of service with detailed and specific contradictions to the statements made in the process server's affidavit is necessary to dispute the veracity or content of the affidavit and to warrant the holding of a traverse hearing."). Further, any claim that she is not in actual possession of the subpoena, even if true and sworn, has no bearing on the veracity of the process server's affidavits or the effect of service. *See, e.g., Carver Fed. Savings Bank*, 135 A.D.3d at 1214 (upholding process where recipient declined to take papers and server dropped papers at recipient's feet with a statement that he had legal papers to serve); David D. Siegel, N.Y. Prac. § 66 (Personal Delivery of Summons Under CPLR 308(1)) (6th ed.) ("the process server need only leave the summons on a table or other item nearby, or on the sidewalk in front of the defendant, or behind him as he walks away").

II. The Subpoena Properly Seeks Documents From Clifford That Are Relevant And Material To the Proceeding

A. Request 1: Documents Relating Specific Issues Associated With The “Stormy” Documentary

Request 1 of the subpoena includes two subject-matter limitations. The request seeks documents that relates to both the documentary and one or more of the subparts included in the request. There are two categories of subparts: (1) documents relating to the development of the documentary, its promotion, and Clifford’s compensation (Requests 1(a)-(h)); and (2) documents relating to the documentary and the upcoming trial, President Trump, and Michael Cohen (Requests 1(i)-(q)). The first category is targeted at records relating to strategic efforts by Clifford, while working with NBCUniversal, to make money by prejudicing President Trump and the trial, which is core admissible evidence of bias, motive, and hostility toward President Trump. Similarly, the second category seeks documents that show Clifford working with NBCU to impact the trial and President Trump.

The materials sought are highly probative of acute—and extremely recent and ongoing—bias, motive, and hostility harbored by Clifford. Evidence of this misconduct is not “general discovery” and cannot be relegated to the status of materials bearing on “general credibility.” Ex. 8 at 2. The Court of Appeals has explicitly distinguished between “impeachment of witnesses’ general credibility” and the separate issue of “specific ‘biases, prejudices or ulterior motives of the witness as they may relate directly to issues or personalities in the case at hand.’” *Gissendanner*, 48 N.Y.2d at 548 (quoting *Davis v. Alaska*, 415 U.S. 308, 316 (1974)); *see also* 12/18/23 Dec. & Order at 7 (evidence of specific biases, prejudices or ulterior motives is not “general credibility”); Ex. 10 at 39 (“[T]he defense is correct, a witness’s bias can always be explored.”); Guide to N.Y. Evid. Rule 6.11, Note (“Impeaching evidence is not collateral when . . . independently admissible

to impeach the witness, *e.g.* show the witness’s bias, [or] hostility” (citations omitted)); Guide to N.Y. Evid. Rule 6.13 (“The credibility of a witness may be impeached by asking the witness on cross-examination about the witness’s bias, hostility, or interest for or against any party to the proceeding and by extrinsic evidence of such bias, hostility, or interest.”). Thus, the requested documents would be relevant, material and admissible at trial to show Clifford’s bias and financial interest in the outcome of this case, and would not be precluded as extrinsic evidence.

Recent events demonstrate that Clifford possesses specific evidence of (1) her bias and hostility toward President Trump, in that she is pursuing financial and reputational benefits based on her status as an alleged witness in this case; and (2) her motive to lie at trial, in that she is positioning herself to make more money and enhance her marketability by presenting her fabricated claims to the jury rather than telling the truth and risking the loss of the enterprise she has built on the foundation of opposing President Trump and her notoriety associated with this case. Evidence of Clifford’s financial motives and hostility is particularly significant in light of the fact that she owes President Trump legal fees awarded in connection with the dismissal of meritless defamation claims and related appeals.¹¹ Further, the recency of these events, Clifford’s status as a key witness, and the prejudicial impact of Clifford’s extrajudicial statements, distinguish this situation from President Trump’s prior requests.

In light of these facts, requests for “all” documents or communications within a particular category are not indicative of general discovery requests or fishing expeditions, and they are not unduly burdensome under the circumstances presented. The Court of Appeals so held in *Kozlowski*, where the challenged subpoena sought “[a]ll memoranda and notes” relating to 19

¹¹ See, *e.g.*, ECF No. 60, *Clifford v. Trump*, No. 20-55880 (9th Cir. Apr. 4, 2023); *Clifford v. Trump*, 2018 WL 6519029, at *6 (C.D. Cal. Dec. 11, 2018).

topics. 11 N.Y.3d at 235; *see also People v. Duran*, 32 Misc.3d 225, 226, 230 (Crim. Ct. Kings Cnty. 2011) (denying motion to quash subpoena seeking “any and all” video surveillance and records); *Ensign Bank, F.S.B. v. Gerald Modell, Inc.*, 163 A.D.2d 149, 149 (1st Dep’t 1990) (where a discovery request is “specific enough to apprise defendant of the categories of items sought,” use of the term “all” is not overbroad or overly burdensome).

While we recognize that the Court relied in the alternative on New York’s Shield Law to quash the defense subpoena to NBCU in an April 5, 2024 decision, we respectfully disagree that there is any material difference between the subpoena at issue in *Kozlowski* and the defense subpoenas to NBCU and Clifford. *See* 4/5/24 Op. at 3. The subpoena in *Kozlowski* “sought from Boies Schiller [a]ll memoranda and notes of [the firm’s] personnel (or forensic accountants working on their behalf) relating to interviews of employees, directors or auditors of Tyco.” 11 N.Y.3d at 235 (quoting subpoena). The request in *Kozlowski* for “all memoranda and notes” from an unspecified number of “personnel” regarding an unspecified number of “interviews” of unnamed “employees, directors or auditors,” is no less broad than the requests in the subpoena at issue here. Whereas the subpoena in *Kozlowski* had no subject matter limitations, Request 1 has two: responsive materials must relate to *both* the Documentary and “one or more” of the topics in subparts a. – q.

None of the subparts in the subpoena is unduly vague for purposes of a criminal defendant’s efforts to obtain critical impeachment material bearing on categories of evidence that, as both the Court of Appeals and the underlying evidentiary rules recognize, are *admissible at trial* in connection with the cross-examination of Clifford. For example, the Court called attention to subpart o. in the April 5, 2024 decision relating to the subpoena to NBCU. 4/5/24 Op. at 3-4. A request seeking the Documents that link Clifford’s documentary to the upcoming trial is one of the

more basic and important forms of impeachment evidence we are seeking because such documents demonstrate that Clifford acted on a motive to monetize her hostility towards President Trump by participating in the creation and release of the Documentary that would be released shortly before the trial. To the extent the Court has further concerns about the scope of the subparts, we would be happy to discuss them on the record and modify them as necessary to address those concerns. But Request 1 is appropriate pursuant to CPL § 610.20 and not subject to wholesale quashing—particularly in the absence a motion to quash—given the factual record supporting the Request.

B. Request 2: Communications With Potential Witnesses And Potential Hearsay Declarants

Request 2 of the subpoena seeks, for the period between April 1, 2023 to March 18, 2024, the production of documents relating to communications with the following anticipated witnesses and/or hearsay declarants at the upcoming trial: Michael Cohen or his representatives; Karen McDougal; Elizabeth Jean Carroll; Jessica Leeds; or Natasha Stoyloff.

Communications between Clifford and other trial witnesses, such as Cohen and McDougal, are relevant to bias and motive, including by establishing that they colluded to get their stories straight and coordinate their manufactured testimony. Carroll, Leeds, and Stoyloff has each presented contested sexual misconduct claims against President Trump, including through trial testimony, and Clifford’s communications with those witnesses is similarly probative of bias and motive.

In addition, DANY has indicated in motions *in limine*, their *Sandoval* notice, and their current exhibit list that they will try to offer hearsay evidence of allegations made by Carroll, Leeds, and Stoyloff against President Trump. *See* People’s *Sandoval* Notice at 2; People’s MILs at 47-50. Although the Court should reject this hearsay as inadmissible and unduly prejudicial, President Trump will be entitled to impeach Carroll, Stoyloff, and Leeds to the same extent as if

they testified at the trial should the Court allow it to be admitted. *See People v. Delvalle*, 248 A.D.2d 126, 127 (1st Dep’t 1998) (prior inconsistent statement was properly admitted to impeach a hearsay declarant’s credibility). As part of that impeachment, President Trump will offer evidence of the motivations driving the timing and content of the allegations, coordination between the witnesses and hearsay declarants, and overlapping self-promotion efforts designed to monetize their status as witnesses in this and other cases.

Request 2 of the subpoena cannot be properly described as an “unwarranted fishing expedition.” Ex. 8 at 2. Clifford is known to have communicated with Cohen and his representatives, as well as with Carroll, regarding President Trump and allegations against President Trump in the above-referenced matter. Clifford appeared on Cohen’s podcast, “Mea Culpa,” in both February and September 2021, during which both Clifford and Cohen made inflammatory and untrue statements concerning President Trump and Clifford’s alleged encounter with President Trump.¹² Clifford also launched her own podcast in December 2023, which is (or was) produced by the same production company as Cohen’s podcast, seemingly under the “Mea Culpa” umbrella.¹³

Kathy Griffin recently confirmed that Clifford is actively communicating with Carroll. On the February 6, 2024 episode of Clifford’s podcast, Griffin revealed that she and Clifford communicate with Carroll by text message regarding matters that are relevant and material to President Trump’s cross-examination of Clifford. Griffin stated in relevant part:

[L]et’s be really honest because we are both friends with her. But I can say it even if you can’t. We are on a text chain with E. Jean

¹² *Mea Culpa, Stormy Daniels Is Not Afraid* (Feb. 9, 2021); *Mea Culpa, Breaking!!! Stormy Daniels Returns to Mea Culpa* (Sept. 19, 2021).

¹³ *Beyond the Norm With Stormy Daniels* by Audio Up, AMAZON, <https://www.amazon.in/BEYOND-NORM-STORMY-DANIELS/dp/B0CP2WJ6SL>; *Mea Culpa*, Audio Up Media, <https://www.audioup.com/shows/meaculpa>.

Carroll . . . It's a text chain I'm very proud of. But let's face it Trump said almost word for word the same things about you as he said about E. Jean. . . . Thank God the jury went her way. I think the tide is already turning for you.¹⁴

Moreover, Griffin has since revealed the scope and “daily” frequency of those discussions, stating: “And let me tell you, as someone who the feds have actually come after, I really hope they don't ever subpoena that text chain. . . . We don't go easy. We don't even call Trump ‘him.’ We call him ‘it.’ . . . Yeah, we're hardcore.”¹⁵ Accordingly, the Court should order Clifford to produce her communications with the witnesses and potential hearsay declarants identified in Request 2.

CONCLUSION

For the foregoing reasons, President Trump respectfully requests that this Court compel Clifford to produce responsive documents in accordance with the March 18, 2024 subpoena, as modified.

Dated: April 12, 2024
New York, New York

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¹⁴ Beyond the Norm with Stormy Daniels, *Stormy and Kathy Griffin Are Not Sorry* (Feb. 6, 2024).

¹⁵ Benjamin Lindsay, *Kathy Griffin Says She's on a Group Text With Mary Trump, Stormy Daniels, E. Jean Carroll: 'I Really Hope the Feds Don't Subpoena That,'* THE WRAP (Apr. 3, 2024), <https://www.thewrap.com/kathy-griffin-mary-trump-stormy-daniels-e-jean-carroll-trump-texts/>.