

At _____
of the Supreme Court of the State of New
York, 60 Centre Street, New York, NY
on the ____ day of August, 2020

PRESENT: _____

J.S.C.

PEOPLE OF THE STATE OF NEW
YORK, by LETITIA JAMES,
Attorney General of the State of New
York,

Petitioner,
-against-

THE TRUMP ORGANIZATION,
INC.; DJT HOLDINGS LLC; DJT
HOLDINGS MANAGING
MEMBER LLC; SEVEN SPRINGS
LLC; ERIC TRUMP; CHARLES
MARTABANO; MORGAN, LEWIS
& BOCKIUS, LLP; and SHERI
DILLON,

Respondents.

Index No. _____

Motion Sequence _____

**[PROPOSED] ORDER TO SHOW
CAUSE – MOTION TO FILE IN
CAMERA AND UNDER SEAL**

Upon reading and filing of the Verified Petition, dated August 21, 2020; the Affirmation of Austin Thompson in Support of the Office of the Attorney General’s Motion to File *in Camera* and Under Seal, dated August 21, 2020, and the exhibits annexed thereto; the Certification of Merit Pursuant to 22 N.Y.C.R.R. 130-1.1(c); and upon the application of LETITIA JAMES, Attorney General of the State of New York, on behalf of the People of the State of New York;

LET Respondents The Trump Organization, Inc., DJT Holdings LLC, DJT Holdings Managing Member LLC, Seven Springs LLC, Eric Trump, Charles Martabano, Morgan, Lewis & Bockius LLP and Sheri Dillon (collectively, the “Respondents”) or their counsel appear and

show cause before IAS Part __, of the Supreme Court, New York County, at the Courthouse located at 60 Centre Street, New York, New York 10007, on _____ at _____ a.m./p.m., or as soon thereafter as counsel can be heard, why the Court should not Order that the Second Affirmation of Matthew Colangelo in support of the Office of the Attorney General's Order to Show Cause to Compel Compliance with Investigatory Subpoenas (Filed *in Camera*), dated August 21, 2020, be considered *in camera* and investigatory information may be redacted from public submissions in this proceeding, with unredacted versions of those submissions to be filed under seal;

SUFFICIENT CAUSE being alleged therefore, it is

ORDERED that the Second Affirmation of Matthew Colangelo in support of the Office of the Attorney General's Order to Show Cause to Compel Compliance with Investigatory Subpoenas (Filed *in Camera*), dated August 21, 2020, and the exhibits annexed thereto, may be submitted for *in camera* under seal, to be returned to Petitioner if the Court chooses not to consider it;

ORDERED that, pending the hearing, the Petitioner and Respondents shall submit any other filings that incorporate investigatory information—including witness names or the contents of OAG subpoenas—in redacted form for docketing, and in unredacted form with access restricted to counsel for the parties and authorized court personnel;

ORDERED that, pending the hearing, the Petitioner and Respondents shall submit slip-sheets in place of confidential exhibits to such filings for docketing, and the confidential exhibits with access restricted to counsel for the parties and authorized court personnel;

ORDERED that service of a copy of this Order, and the papers upon which it was granted, upon Respondents:

(1) by email to Respondents the Trump Organization, DJT Holdings LLC, DJT Holdings Managing Member LLC, Seven Springs LLC, and Eric Trump's counsel, LaRocca Hornik Rosen & Greenberg LLP, by Larry Rosen, Esq., at lrosen@lhrgb.com, on or before _____;

(2) by email to Respondent Eric Trump's counsel, Mukasey Frenchman & Sklaroff LLP, by Marc Mukasey, Esq., at Marc.Mukasey@MukaseyLaw.com, and Law Offices of Alan S. Futerfas, by Alan Futerfas, Esq., at asfuterfas@futerfaslaw.com, on or before _____;

(3) by email to Respondent Charles Martabano's counsel, by George Calcagnini, Esq., at gcalcagnin@aol.com, on or before _____;

(4) by email to Respondent Morgan, Lewis & Bockius LLP's counsel, Morgan, Lewis & Bockius LLP, by Zane Memeger, Esq., at zane.memeger@morganlewis.com, and Nathan Andrisani, Esq., at nathan.andrisani@morganlewis.com, on or before _____; and

(5) by email to Respondent Sheri Dillon's counsel, Zuckerman Spaeder LLP by Graeme Bush, Esq., at gbush@zuckerman.com, and Catherine Duval, Esq. at CDuval@zuckerman.com, on or before _____

be deemed good and sufficient service; and it is further

ORDERED that any opposition papers shall be served on Petitioner by email to Petitioner's counsel, OAG, by Matthew Colangelo at Matthew.Colangelo@ag.ny.gov and Austin.Thompson on _____, six business days before the date set forth above for the hearing on Petitioner's motion to compel; and

ORDERED that any reply papers shall be served unredacted on Respondents by email to Respondents' counsel at lrosen@lhr gb.com, Marc.Mukasey@MukaseyLaw.com, asfuterfas@futerfaslaw.com, gcalcagnin@aol.com, zane.memeger@morganlewis.com, nathan.andrisani@morganlewis.com, gbush@zuckerman.com, and cduval@zuckerman.com on _____, one business day before the date set forth above for the hearing on Petitioner's motion to compel.

ENTER:

J.S.C. _____