

UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

Thurgood Marshall U.S. Courthouse 40 Foley Square, New York, NY 10007 Telephone: 212-857-8500

MOTION INFORMATION STATEMENT

Docket Number(s): 23-793

Caption [use short title]

Motion for: leave to withdraw as counsel

Set forth below precise, complete statement of relief sought:

Tacopina Seigel & DeOreo is seeking leave to withdraw  
as counsel for Defendant-Appellant Donald J. Trump  
in this appeal

Carroll v. Trump

MOVING PARTY: Tacopina Seigel & DeOreo

OPPOSING PARTY: Donald J. Trump

☐ Plaintiff

☒ Defendant Counsel for Defendant-Appellant

☐ Appellant/Petitioner

☐ Appellee/Respondent

MOVING ATTORNEY: Joseph Tacopina

OPPOSING ATTORNEY: none

[name of attorney, with firm, address, phone number and e-mail]

Tacopina, Seigel & DeOreo

275 Madison Ave, Fl. 35, New York, NY 10016

jtacopina@tacopinalaw.com; 212-227-8877

Court- Judge/ Agency appealed from: Hon. Lewis A. Kaplan; United States District Court for the Southern District of New York

Please check appropriate boxes:

Has movant notified opposing counsel (required by Local Rule 27.1):

☐ Yes

☒ No (explain): there is no opposing counsel for

this motion, thus Rule 27.1(b) is not applicable

Opposing counsel's position on motion:

☐ Unopposed

☐ Opposed

☐ Don't Know

Does opposing counsel intend to file a response:

☐ Yes

☐ No

☐ Don't Know

FOR EMERGENCY MOTIONS, MOTIONS FOR STAYS AND INJUNCTIONS PENDING APPEAL:

Has this request for relief been made below?

☐ Yes

☐ No

Has this relief been previously sought in this court?

☐ Yes

☐ No

Requested return date and explanation of emergency:

Is oral argument on motion requested?

☐ Yes

☒ No (requests for oral argument will not necessarily be granted)

Has argument date of appeal been set?

☐ Yes

☒ No If yes, enter date:

Signature of Moving Attorney:

Date:

1/15/24

Service by:

☒ CM/ECF

☒ Other

[Attach proof of service]

Service on Donald J. Trump by Federal Express overnight delivery (see attached affidavit of service)

UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT

---

E. JEAN CARROLL,	:
<i>Plaintiff- Appellee,</i>	:
	: Docket No. 23-793
-against-	:
	:
DONALD J. TRUMP,	:
	:
<i>Defendant - Appellant.</i>	:

---

**DECLARATION OF JOSEPH TACOPINA**

---

I, JOSEPH TACOPINA, declare as follows under penalty of perjury:

1. I am the managing partner of Tacopina Seigel & DeOreo ("TSD"), counsel for Defendant-Appellant Donald J. Trump ("Trump") in this appeal.
2. I respectfully submit this Declaration in support of TSD's motion, made pursuant to Local Civil Rule 27.1, to withdraw as counsel (including TSD attorneys Joseph Tacopina, Chad D. Seigel and Matthew G. DeOreo) for Trump, with such other and further relief as the Court deems just and proper.
3. Notably, counsel's withdrawal will not preclude the perfecting of the instant appeal. Indeed, Trump's brief and appendices have already been filed.
4. Accordingly, TSD respectfully requests that the Court grant TSD leave to withdraw as counsel, including TSD attorneys Joseph Tacopina, Chad D. Seigel and Matthew G. DeOreo, with such other and further relief as it deems just and proper.

5. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
January 15, 2024

  
\_\_\_\_\_  
JOSEPH TACOPINA

UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT

-----X  
E. JEAN CARROLL,

Plaintiff- Appellee,

-against-

DONALD J. TRUMP,

Defendant – Appellant  
-----X

**DECLARATION OF SERVICE**

Docket No. 23-793

I, MATTHEW G. DeOREO, declare as follows under penalty of perjury:

On January 15, 2024 I served the following documents upon DONALD J. TRUMP, Mar-a-Lago Club, 1100 S Ocean Blvd, Palm Beach, FL 33480, by sending a true copy of the same into the custody of **Federal Express** for overnight delivery:

1. Form T-1080;
2. Declaration of Joseph Tacopina.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 15, 2024



MATTHEW G. DeOREO