

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NUMBER: 2:22-cv-14102-DMM

DONALD J. TRUMP,

Plaintiff,

v.

HILLARY R. CLINTON, et al.,

Defendant.

_____ /

AFFIDAVIT IN SUPPORT OF MOTION TO EXTEND TRIAL DATE

County of Broward)
)
State of Florida)

Before the undersigned authority, PETER TICKTIN, ESQUIRE, on this 20th day of July, 2022, being duly advised that the following is being stated under oath, subject to the laws of perjury, states as follows:

1. The Affiant is the Senior Partner of The Ticktin Law Group, and acts as Local Counsel for the Plaintiff, in the instant action, and has personal knowledge of the statements contained in this Affidavit.

2. The Affiant files this in support of the Plaintiff, DONALD J. TRUMP's Motion to Extend the Trial Date, and to set forth a full showing of good cause, pursuant to Local Rule 7.6

3. The Affiant, on behalf of his client, assisted in filing a lawsuit against 29 Defendants, who as alleged in the Plaintiff's Complaint, conspired to spread a false lie to the

American people, and the rest of the world, that the Plaintiff had colluded with Russia, as well as its President Vladimir Putin, in the run-up to the 2016 election.

4. Upon filing the Complaint, the Court, on its own, entered an Order Setting a Trial Date for May 8, 2023, for a two-week trial period. (DE 39).

5. First, the Affiant believes that the Jury Trial will take close to 45 days, as opposed to 14 days, and this is a reason for the Trial Date to be Extended, to allow additional time due to the large number of defendants, witnesses to be called, and documents to be presented as evidence.

6. Moreover, as detailed in the Motion to Extend the Trial Date, the Affiant has been unable to start the discovery period, due to the lack of Scheduling Order being issued in this case, pursuant to Rule 16.

7. As the initial Complaint was filed on March 24, 2022, with a one-year window until the trial date in May, 2023, the Affiant, and his client, has now lost close to 4 months of time, in order to conduct discovery. Now, leaving the Affiant and his client, less than 6 months to conduct discovery in this matter, which is anticipated will require the review of thousands of pages of discovery, and the need to take a large number of depositions.

8. Moreover, as there are so many parties involved in the litigation, the various Defendants filed their Motions to Dismiss on July 14, 2022, with the Response due on or before July 28, 2022. With the pleadings still open, the case is in its relative infancy.

9. This has been due to no part of the Plaintiff, or any of the Defendants. As the parties have been diligently moving the case forward. However, it took time to get the Defendants all served, and the Plaintiff amended his complaint, in June, 2022, making the Complaint 185 pages, and adding additional facts and parties.

