## 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 20 <sup>th</sup> of

Before the undersigned authority, PETER TICKTIN, ESQUIRE, on this 20<sup>th</sup> 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.

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10. Due to the need to conduct discovery, and the short window until the Trial Date,

the Affiant can show good cause to warrant the extension of the Trial Date.

11. This is an exceptional circumstance, due to the late start on discovery, the number

of parties involved, the complexity of the case, and the trial date set for one year from the date of

the filing on the initial complaint.

12. While, the Affiant, as well as his Plaintiff wishes to move this case forward,

expeditiously, it is simply not practicable to have a trial in this matter, in the month of May 2023.

13. The Motion to Extend the Trial Date was not done for any improper purpose and

would not cause any unfair prejudice to any of the Defendants, and it would ultimately benefit all

parties, to be able to properly conduct discovery, put together their cases, conduct motion

practice in a reasonable amount of time, and ultimately, try their respective positions.

14. Therefore, the Affiant, presents this Affidavit in support of the Plaintiff's Motion

to Extend the Trial Date, and a showing of good cause to warrant the Court granting the

continuance of the Trial Date.

FURTHER AFFIANT SAYETH NAUGHT.

Dated this 20<sup>th</sup> day of July, 2022.

Verification

I Declare Under Penalty of Perjury under the laws of the United States of America that the

foregoing is true and correct.

\_\_\_/s/ Peter Ticktin\_

Peter Ticktin, Esquire

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