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VIA ECF

The Honorable Lewis A. Kaplan, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Carroll v. Trump*
Civil Case No.: 1:20-cv-7311-LAK-JLC

Dear Judge Kaplan:

I write in response to the letter submitted earlier today by Plaintiff’s lead counsel, Roberta Kaplan. ECF 282. In her letter, Ms. Kaplan mischaracterizes the substance of a letter recently submitted on behalf of President Trump, *see* ECF 281, and makes inflammatory and unwarranted accusations against the undersigned.

Contrary to Ms. Kaplan’s contention, there are no “false allegations of a ‘mentor-mentee relationship between Your Honor and [Ms. Kaplan]’” contained in my January 29 letter. ECF 282 at 1. The purpose of the letter was simply to inquire as to whether there is any merit to a recently published *New York Post* story which reported on the alleged existence of such a relationship. *See* ECF 282, Ex. A. To be clear, this claim originated solely from the *New York Post*, where it was purportedly sourced from a “former Paul Weiss partner who asked not to be named.” *Id.* at 2. I played no part in uncovering this information; have never communicated with the unnamed Paul Weiss partner; and have no personal knowledge as to whether the information contained in the article is true or false. As I stated in my January 29 letter, I “learned for the first time” about the purported mentor-mentee relationship from the *New York Post*. ECF 281 at 1. Although I am quoted in the article, my statements were given in response to the reporter’s request for comment (which, per the article, was also sought from Kaplan Hecker & Fink).

The point of my January 29 letter was to verify whether the information contained in the *New York Post* article is accurate. Since Ms. Kaplan has now denied that there was ever a mentor-mentee relationship between herself and Your Honor, this issue has seemingly been resolved.¹

We thank the Court for its attention to this matter.

Respectfully submitted,

Alina Habba, Esq.

For HABBA MADAIO & ASSOCIATES LLP

¹ There are, however, various other issues relating to the Court’s conduct, including potential bias hostility towards defense counsel, that will be raised in post-trial motions and on appeal.