UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP, in his personal capacity,

Defendant.

Civil Action No.: 1:20-cv-7311-LAK-JLC

NOTICE OF MOTION FOR APPROVAL OF SUPERSEDEAS BOND AND STAY OF EXECUTION OF JUDGMENT PENDING APPEAL

PLEASE TAKE NOTICE that that the defendant, President Donald J. Trump ("President Trump"), hereby moves this Court, before the Hon. Lewis A. Kaplan, United States District Judge for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, on a date to be set by the Court, for entry of an Order (1) approving the supersedeas bond filed herewith in the amount of \$91,630,000.00; and (2) staying execution of the judgment entered in favor of Plaintiff E. Jean Carroll and against President Trump on February 8, 2024 in the total amount of \$83,300,000.00 (Docket No. 285) pending appeal.

This motion is supported by the annexed declaration, any arguments or evidence presented in reply, all arguments or evidence presented at a hearing or with leave of Court, and upon all prior proceedings, pleadings, and filings in this action.

<u>/s/ Alina Habba</u> Alina Habba, Esq. Michael T. Madaio, Esq. HABBA MADAIO & ASSOCIATES LLP 112 West 34th Street, 17th & 18th Floors New York, New York 10120 Telephone: (908) 869-1188 E-mail: ahabba@habbalaw.com

Dated: New York, New York March 8, 2024 <u>/s/ D. John Sauer</u> D. John Sauer* William O. Scharf** JAMES OTIS LAW GROUP, LLC 13321 North Outer Forty Road, Suite 300 Chesterfield, Missouri 63017 (314) 562-0031 John.Sauer@james-otis.com * *Pro Hac Vice* pending ** *Pro Hac Vice* forthcoming

Attorneys for President Donald J. Trump