

**HABBA MADAIO & ASSOCIATES LLP**

Alina Habba, Esq.  
1430 US Highway 206, Suite 240  
Bedminster, New Jersey 07921

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112 West 34<sup>th</sup> Street, 17<sup>th</sup> & 18<sup>th</sup> Floors  
New York, New York 10120  
Telephone: (908) 869-1188  
Facsimile: (908) 450-1881  
E-mail: ahabba@habbalaw.com  
*Attorneys for defendant, Donald J. Trump*

**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

**DECLARATION OF ALINA HABBA**

I, Alina Habba, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am managing partner of the firm of Habba Madaio & Associates LLP, counsel for the defendant, President Donald J. Trump (“President Trump”), in the above-captioned matter (the “Action”). I submit this declaration in support the instant Motion for an Order recognizing the supersedeas bond obtained by President Trump in the amount of \$91,630,000.00, and to approve it as conforming to the requirements outlined in Fed. R. Civ. P. 62 to stay enforcement of the Judgment herein, to the extent that Judgment awards damages, pending appeal.
2. On February 8, 2024, this Court entered Judgment (Dkt. No. 285) awarding Plaintiff compensatory and punitive damages totaling \$83,300,000.00.
3. President Trump filed a Notice of Appeal on March 8, 2024.

4. Pursuant to Fed. R. Civ. P. 62, President Trump has obtained a supersedeas bond issued by Federal Insurance Company in the sum of \$91,630,000.00. A true and accurate copy of the supersedeas bond is annexed hereto as **Exhibit A**.

5. The Federal Rules of Civil Procedure provide for the posting of a bond or other security to stay execution on a judgment:

**(a) Automatic Stay.** Except as provided in Rule 62(c) and (d), execution on a judgment and proceedings to enforce it are stayed for 30 days after its entry, unless the court orders otherwise.

**(b) Stay by Bond or Other Security.** At any time after judgment is entered, a party may obtain a stay by providing a bond or other security. The stay takes effect when the court approves the bond or other security and remains in effect for the time specified in the bond or other security.

Fed. R. Civ. P. 62(a)-(b)

6. Approval of the bond by this Court is requisite to formalize the stay of enforcement, as the bond secures President Trump's monetary obligations under the Judgment and serves as a guarantee for the satisfaction of the same, should the appeal not prove meritorious.

7. President Trump respectfully requests that this Court recognize the supersedeas bond obtained by President Trump in the sum of \$91,630,000.00 and approve it as adequate and sufficient to stay the enforcement of the Judgment, to the extent that the Judgment awards damages, pending the ultimate disposition of President Trump's appeal.

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

Dated: March 8, 2024

Respectfully submitted,

  
Alma Habba, Esq.  
HABBA MADAIO & ASSOCIATES LLP