



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

No. 20 Civ. 7311 (LAK)

DONALD J. TRUMP,

Defendant.

STIPULATION AND ~~PROPOSED~~ ORDER

Pursuant to Your Honor's Individual Rules of Practice, Plaintiff E. Jean Carroll and Defendant Donald J. Trump, by their undersigned counsel and subject to the approval of the Court, enter into the following Stipulation and Proposed Order:

WHEREAS on March 5, 2024, Mr. Trump filed motions for judgment as a matter of law and for a new trial. *See* ECF 309, 311;

WHEREAS under Your Honor's Individual Rules of Practice, Ms. Carroll's deadline to respond to both motions is March 19, 2024;

WHEREAS the parties have met and conferred regarding Ms. Carroll's request to extend to March 26, 2024 the deadline for responding to both motions;

WHEREAS Ms. Carroll requested this extension due to the diversion of attention caused by the need to respond to Mr. Trump's motions to stay execution of judgment, ECF 286, and to approve supersedeas bond, ECF 317, as well as by the March 20, 2024 deadline that the Second Circuit has established for Ms. Carroll's appellee brief in *Carroll II*, *see Carroll v. Trump*, No. 23-793 (2d Cir.), ECF 105;

WHEREAS Mr. Trump consents to Ms. Carroll's request and has sought a reciprocal one-week extension on his reply deadline, to which Ms. Carroll has consented;

WHEREAS Ms. Carroll maintains that a one-time, single-week extension of the deadlines is consistent with ensuring an expeditious resolution of Mr. Trump's post-trial motions.

IT IS ACCORDINGLY STIPULATED AND AGREED that Ms. Carroll's deadline for responding to Mr. Trump's motions for judgment as a matter of law and for a new trial are extended to March 26, 2024, and Mr. Trump's deadline for submitting a reply in support of those motions is extended to April 9, 2024.

Dated: March 13, 2024

/s/ D. John Sauer

D. John Sauer (admitted *pro hac vice*)
William O. Scharf (admitted *pro hac vice*)
JAMES OTIS LAW GROUP, LLC
13321 North Outer Forty Road, Suite 300
Chesterfield, Missouri 63017
(314) 562-0031
John.Sauer@james-otis.com

Alina Habba
Michael Madaio
HABBA MADAIO & ASSOCIATES LLP
1430 U.S. Highway 206, Suite 240
Bedminster, NJ 07921
Phone: (908) 869-1188
ahabba@habbalaw.com
mmadaio@habbalaw.com

Counsel for Defendant Donald J. Trump

/s/ Roberta A. Kaplan

Roberta A. Kaplan
Shawn Crowley
Trevor W. Morrison (admitted *pro hac vice*)
Matthew J. Craig
KAPLAN HECKER & FINK LLP
350 Fifth Avenue, 63rd Floor
New York, New York 10118
Phone: (212) 763-0883
rkaplan@kaplanhecker.com
scrowley@kaplanhecker.com
tmorrison@kaplanhecker.com
mcraig@kaplanhecker.com

Joshua Matz
KAPLAN HECKER & FINK LLP
Washington, DC 20001
(212) 763-0883
jmatz@kaplanhecker.com

Counsel for Plaintiff E. Jean Carroll

SO ORDERED


LEWIS A. KAPLAN, USDC

3/14/24