

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP, in his personal capacity,

Defendant.

No. 20 Civ. 7311 (LAK)

**DECLARATION OF ROBERTA A. KAPLAN IN SUPPORT OF
PLAINTIFF E. JEAN CARROLL'S MEMORANDUM OF LAW
IN OPPOSITION TO DEFENDANT DONALD J. TRUMP'S
MOTION FOR A NEW TRIAL OR REMITTITUR**

I, Roberta A. Kaplan, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a member of the bar of the State of New York and am admitted to appear before this Court. I am a partner in the law firm Kaplan Hecker & Fink LLP, counsel for Plaintiff E. Jean Carroll in the above-captioned action.

2. I respectfully submit this declaration in support of Carroll's memorandum of law in opposition to Defendant Donald J. Trump's motion for a new trial or remittitur.

3. Attached hereto as **Exhibit A** is true and correct copy of excerpts from the official transcript of the trial in this action.

4. Attached hereto as **Exhibit B** is a true and correct copy of selected public statements by Trump since the verdict in *Carroll v. Trump*, No. 22 Civ. 10016 (S.D.N.Y.).


5. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the official transcript of jury selection for the trial in this action.

6. Attached hereto as **Exhibit D** is a true and correct copy of PX-97-T, which was entered into evidence during the trial in this action.

7. Attached hereto as **Exhibit E** is a true and correct copy of PX-167-T, which was entered into evidence during the trial in this action.

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

Dated: New York, New York
March 26, 2024



Roberta A. Kaplan