

Tacopina Seigel Trial Lawyers

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FILED BY ECF

Hon. Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

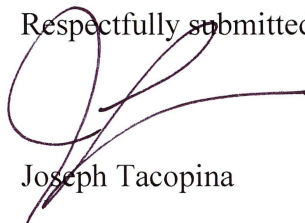
Re: Carroll v. Trump, 22 Civ. 10016 (LAK)

Your Honor:

We write to respectfully request that the Court so order the enclosed Stipulation and Proposed Order Regarding the Use of a Cash Deposit in Court as Security in Lieu of a Supersedeas Bond. The cash deposit will be in the amount of \$5,550,000, which is 111% of the judgment amount and is consistent with the traditional security percentage of supersedeas bonds. Additionally, my office is currently holding \$5,550,000 in trust and will promptly make such deposit upon the entering of this Stipulation and Order.

We thank the Court for its consideration.

Respectfully submitted,



Joseph Tacopina

cc: All counsel by ECF