

tacopina seigel trial lawyers

TACOPINA SEIGEL & DEOREO

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February 10, 2023

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) (“Carroll II”)

Dear Judge Kaplan:

We respectfully submit this letter on behalf of Defendant, Donald J. Trump, to briefly reply to Plaintiff’s opposition to our request for the full copy of the DNA report she filed in connection with *Carroll I*.

At the outset, while Plaintiff asserts that Defendant’s request is an attempt to delay the trial, that is simply not true. As we advised the Court in the very first paragraph of our letter, “we are not seeking to delay the trial date.” To that end, we have already conferred with a DNA expert, and will be able to immediately have a DNA analysis conducted and a relevant report generated.

In addition, Plaintiff’s assertion that Defendant or his legal team, in an effort to taint the potential jury pool, told reporters that Defendant is willing to provide a DNA sample is categorically false. First, neither Defendant nor his legal team conveyed any such information to reporters. And second, the contention defies commonsense, as just a day after the cited February 9th article was published, Defendant filed the instant request. Accordingly, neither Defendant nor his legal team would have had a reason to provide such information to the press for purposes of tainting a jury pool. Ironically, despite Plaintiff’s complaint about seeking to influence the potential jury by conveying information to the media, it is Plaintiff, herself, who wrote a book about her claim and then went on a press tour to further popularize her claim and influence the public. Indeed, Plaintiff’s tweet attached to our prior letter is just one of many examples of Plaintiff continuing to make public statements.

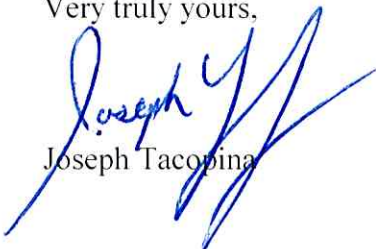
Based on the reasons set forth herein and in our initial letter, we respectfully submit that Plaintiff should be directed to provide the full DNA report.

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Your consideration is greatly appreciated.

Very truly yours,



Joseph Tacopina

cc: All counsel by ECF