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February 19, 2023

VIA ELECTRONIC DELIVERY

Matthew DeOreo, Esq.
Chad Seigel, Esq.
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Tacopina, Seigel & DeOreo
275 Madison Ave., Fl. 35
New York, NY 10016

***Re: E. Jean Carroll v. Donald J. Trump
No. 22 Civ. 10016 (LAK)***

Dear Counselors,

We regret to inform you that we are unable to proceed with an evaluation of the plaintiff in the above-captioned matter. This is not a decision we have arrived at lightly, but rather, it is the result of hours of reflection and consultation with senior colleagues and three attorneys.

Following Friday evening's email, Dr. Lamoureux continued to analyze the requested evaluation, and as part of these efforts had the opportunity to speak with Dr. Hayes about how we could proceed with the evaluation on Tuesday in a way that would still yield meaningful information to help render factually valid, honest, ethical opinions. After substantial discussion, it was determined that it would not be feasible. Psychometric testing requires a solid clinical interview to be valid, and the allotted time on Tuesday (February 21, 2023) would be insufficient to accomplish this.

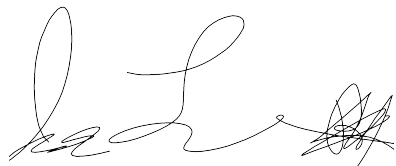
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The critical issue before us is that, following extensive research and discussion during this holiday weekend, we have further updated and developed our understanding of the situation. We do not now believe that it would be ethically permissible for us to proceed with the evaluation as limited by the current court order. Though Dr. Lamoureux initially thought that it could be permissible to perform the evaluation on Tuesday and then rely upon record review to inform the remainder of his opinions, further analysis and discussion with senior colleagues has caused him to revise his initial belief, confirming instead that this is not possible. Simply put, we cannot ethically proceed with the evaluation as ordered by the Court.

Unfortunately, what this adds up is that despite our wish to continue to work with your office and assist you in this matter, it is not possible for us to do so via this IME/IPE.

That said, we remain ready, willing, and able to continue working with you on this matter as consultants. Given our current understanding of the facts, nothing should bar us from providing such guidance, which, unlike our contemplated work as testifying experts, would also preserve confidentiality as your agents. Furthermore, we would also be happy to provide any other expert that you retain with our files and discuss it with him/her to the extent that could be helpful.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ian C. Lamoureux', with a stylized flourish at the end.

Ian C. Lamoureux, M.D.
Diplomate, American Board of Psychiatry and Neurology with
Subspecialty Certifications in Forensic Psychiatry and Brain Injury
Medicine

Matthew DeOreo, Esq.

Chad Seigel, Esq.

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A handwritten signature in black ink that reads "Jill Hayes, Ph.D." The signature is written in a cursive, flowing style.

Jill Hayes, Ph.D.

Clinical, Forensic, and Neuropsychologist