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November 20, 2024

**VIA ECF**

Hon. Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

Re: Trump v. Simon & Schuster, et al., Case No. 1:23-cv-06883 (PGG)(BCM)

Dear Judge Gardephe,

We represent President Donald J. Trump (“Plaintiff”) in the above-captioned matter and write further to our letter, dated August 11, 2023, in which we supported the request of defendants, Bob Woodward, Paramount Global, and Simon & Schuster (“Defendants”) to schedule oral argument.

The Court is aware that President Trump is soon due to be inaugurated as the 47th President of these United States of America.<sup>1</sup> The issues in this case, namely the unlicensed for-profit use of President Trump’s voice that was recorded in an unofficial interview, is both timely and ripe, for fear of further unaccounted for profit being made from the President’s voice. In addition, we trust that the Court can accommodate a discovery process that will cause minimal interference with the President’s impending obligations.

Therefore, we would ask that the Court set an expedited schedule for an Initial Case Management Conference pursuant to Individual Rule VII(B), and direct the parties to submit a joint letter and proposed case management plan seven days before the initial conference.

Should the Court wish to schedule oral argument on the pending motion, we can provide dates of unavailability at the Court’s direction.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'R. Garson', with a small dot to the right.

Robert Garson

cc: All Counsel of Record (via ECF)

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<sup>1</sup> Which will necessitate an amendment to the caption.