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PART 59 JUL 02 2024



ALVIN L. BRAGG, JR.
DISTRICT ATTORNEY

July 2, 2024

Hon. Juan M. Merchan
New York State Supreme Court, Criminal Term, Part 59
100 Centre Street
New York, New York 10013

RE: People v. Trump, Ind. No. 71543/23

Dear Justice Merchan:

We are in receipt of defendant's pre-motion letter dated July 1, 2024 seeking leave to file a motion to set aside the verdict pursuant to CPL § 330.30(1) based upon the Supreme Court's July 1, 2024 decision in *Trump v. United States*, 2024 WL 3237603. In that letter, defendant requested until July 10, 2024 to submit a memorandum of law in support of such motion. While defendant's letter states that he does "not object to an adjournment of the July 11, 2024 sentencing date," his request to file moving papers on July 10 is necessarily a request to adjourn the sentencing hearing currently scheduled for July 11, 2024 pending resolution of the motion.

Although we believe defendant's arguments to be without merit, we do not oppose his request for leave to file and his putative request to adjourn sentencing pending determination of his motion. We respectfully request a deadline of July 24, 2024—two weeks after defendant's requested deadline—to file and serve a response.

Respectfully Submitted,

/s/ Joshua Steinglass

Joshua Steinglass

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