



TODD BLANCHE  
ToddBlanche@blanchelaw.com  
(212) 716-1250

March 18, 2024

Via Email

Honorable Juan M. Merchan  
Acting Justice - Supreme Court, Criminal Term

**Re: People v. Trump, Ind. No. 71543/23**

Dear Justice Merchan:

We respectfully submit this supplemental premotion letter, pursuant to the Court's March 8, 2024 Order, seeking permission to file the enclosed motion for an adjournment based on prejudicial pretrial publicity. We submitted our original premotion letter on March 10, 2024, and we are renewing this request for two reasons.

First, this evening Stephanie Clifford is hosting a premiere event in Brooklyn for her documentary, which is also being released on Peacock. Clifford's ongoing publicity tour relating to the documentary has included egregious efforts to prejudice the jury pool while seeking to enrich herself, such as a claim published today in *People* that Clifford "Was 'Completely Sure' She'd Be Murdered After Taking On Trump . . . ."<sup>1</sup> These new facts, including today's reports and publicity, further support President Trump's arguments on the merits of the motion and the need for the Court to consider it.

Second, to the extent the Court is considering a further adjournment in connection with the March 25 hearing, despite our request for dismissal, the enclosed motion contains quantitative data from polling and media studies that are relevant to the Court's determination of how much time is necessary in order to ensure that President Trump gets a fair trial. We respectfully submit that it would be more efficient to consider the discovery failures and the prejudicial pretrial publicity problems in combination rather than on a seriatim basis.

/s/ Susan R. Necheles  
Susan R. Necheles  
Gedalia M. Stern  
Necheles Law LLP

/s/ Todd Blanche  
Todd Blanche  
Emil Bove  
Stephen Weiss  
Blanche Law PLLC

*Attorneys for President Donald J. Trump*

Enclosure

Cc: Susan Hoffinger  
Joshua Steinglass  
Matthew Colangelo  
(Via Email)

---

<sup>1</sup> Kyler Alvord, *Stormy Daniels Was 'Completely Sure' She'd Be Murdered After Taking on Trump: 'If Something Happens to Me...'*, PEOPLE (Mar. 18, 2024), <https://people.com/stormy-daniels-documentary-feared-getting-murdered-trump-enemy-8609190>.