## DISTRICT ATTORNEY COUNTY OF NEW YORK

ONE HOGAN PLACE New York, N. Y. 10013 (212) 335-9000



April 8, 2024

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

Dear Justice Merchan:

On April 5, 2024, defendant submitted a pre-motion letter seeking leave to file a motion to enforce certain requests of a subpoena *duces tecum* he claims was served on Stormy Daniels on March 18, 2024, with a return date of March 29, 2024. The People do not oppose defendant's proposed filing, but should the Court grant leave to file, the People respectfully request that the Court (1) set a five-page motion limit, and (2) grant the People the opportunity to respond one week after defendant files his motion. The People will fully brief their objections to the enforcement of the subpoena in their opposition.

Respectfully Submitted,

/s/ Matthew Colangelo
Matthew Colangelo
Christopher Conroy
Katherine Ellis
Susan Hoffinger
Becky Mangold
Joshua Steinglass
Assistant District Attorneys