

**DISTRICT ATTORNEY**

**COUNTY OF NEW YORK**

**ONE HOGAN PLACE**

**New York, N. Y. 10013**

**(212) 335-9000**



**CYRUS R. VANCE, JR.**

DISTRICT ATTORNEY

**VIA ECF AND HAND DELIVERY**

Judge Victor Marrero  
U.S. District Court Judge  
Southern District of New York  
500 Pearl Street, New York, N.Y.  
By FAX: 212-805-6382

September 23, 2019

**Re: Donald J. Trump v. Cyrus R. Vance, Jr.  
Case No. 1:19-cv-08694 (VM)**

Dear Judge Marrero:

We represent the office of Cyrus R. Vance, Jr., District Attorney of New York County, a defendant in this matter.

Pursuant to section II.C of your individual practices, and in light of the discussion between your Chambers and the parties on September 19, 2019 and the expedited nature of the briefing in this matter, we respectfully request that the Court treat this letter and the accompanying memorandum of law as a motion to dismiss the Complaint as to all parties. As described in our memorandum, we believe that a discrete legal issue is dispositive of the entire action, and dismissal is appropriate pursuant to Federal Rules of Civil Procedure 12(b)(3) and 12(b)(6), 28 United States Code section 2283, and related decisional law..

We further request permission to file under seal an unredacted copy of the Declaration of Solomon Shinerock, which relates in part to materials obtained by a grand jury.

Thank you for your consideration of the above requests.

Very truly yours,

A handwritten signature in black ink, appearing to read "Chris", is written over a horizontal line.

Christopher Conroy  
Chief, Major Economic Crimes Bureau  
Solomon Shinerock, Assistant District Attorney  
New York County District Attorney's Office