



**U.S. Department of Justice**  
Civil Division  
Federal Programs Branch  
20 Massachusetts Ave, N.W.  
Washington, DC 20530

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May 31, 2017

**VIA ECF**

The Honorable Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2203  
New York, NY 10007

Re: *Citizens for Responsibility and Ethics in Washington, et al. v. Trump*,  
Civil Action No. 1:17-cv-00458-RA

Dear Judge Abrams:

We write on behalf of Defendant Donald J. Trump, the President of the United States, to respectfully request an enlargement of page limitation for his Memorandum of Law in Support of his Motion to Dismiss due on June 9, 2017. Pursuant to this Court's Individual Rules & Practices in Civil Cases, a memorandum of law in support of a motion to dismiss is limited to 25 pages. Defendant respectfully requests that he be permitted to file a memorandum of law of up to 60 pages in length. Undersigned counsel has consulted with counsel for Plaintiffs, who indicated that they do not oppose the requested extension.

In the 63-page Second Amended Complaint, four different sets of Plaintiffs raise two novel constitutional claims and assert a wide-range of constitutional violations. The requested page extension is necessary to allow Defendant to fully address not only the various Plaintiffs' standing to sue but also the two constitutional issues raised—namely, whether the President's holding of business interests violates the Emoluments Clause and the Compensation Clause of the Constitution. Defendant believes that a thorough discussion of these issues, including relevant background, will assist the Court in deciding Defendant's motion to dismiss. Accordingly, Defendant respectfully requests that he be permitted to file a brief of up to 60 pages.

We thank you for your consideration of this request.

Respectfully submitted

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Civil Division

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Branch Director, Federal Programs Branch

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*/s/ Jean Lin*

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