

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DONALD J. TRUMP, DONALD J. TRUMP  
JR., ERIC TRUMP, IVANKA TRUMP,

and

THE DONALD J. TRUMP REVOCABLE  
TRUST, THE TRUMP ORGANIZATION,  
INC., TRUMP ORGANIZATION LLC, DJT  
HOLDINGS LLC, DJT HOLDINGS  
MANAGING MEMBER LLC, TRUMP  
ACQUISITION LLC, and TRUMP  
ACQUISITION, CORP.,

Plaintiffs,

- against -

DEUTSCHE BANK AG and CAPITAL ONE  
FINANCIAL CORP.,

Defendants.

Docket No. 1:19-cv-03826-ER

**NOTICE OF MOTION FOR A  
PRELIMINARY INJUNCTION**

Per Federal Rule of Civil Procedure 65, Plaintiffs move for a preliminary injunction against Defendants Deutsche Bank AG and Capital One Financial Corp. and Intervenor-Defendants House Permanent Select Committee on Intelligence and House Financial Services Committee, prohibiting these parties from taking any steps to enforce or comply with the challenged subpoenas until this Court enters final judgment. Plaintiffs' motion is based on the attached memorandum of law, their declaration and other filings, and any oral argument or evidence presented at the preliminary-injunction hearing. Plaintiffs are entitled to a preliminary injunction because they have shown ““(a) irreparable harm and (b) either (1) likelihood of success on the merits or (2) sufficiently serious questions going to the merits to make them a fair ground for litigation and a balance of hardships tipping decidedly toward the party requesting the preliminary relief.”” *Citigroup Glob. Markets, Inc. v. VCG Special Opportunities Master Fund Ltd.*, 598 F.3d 30, 35 (2d Cir. 2010).

Dated: May 3, 2019

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DJT Holdings Managing Member LLC, Trump  
Acquisition LLC, and Trump Acquisition, Corp.*

Respectfully submitted,

s/ Patrick Strawbridge

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*Counsel for President Donald J. Trump,  
Donald J. Trump Jr., Eric Trump, and Ivanka Trump*

### **CERTIFICATE OF SERVICE**

I, Patrick Strawbridge, declare under penalty of perjury that I served a copy of this motion and all attached exhibits via email to counsel for Deutsche Bank and the House of Representatives. Counsel for Capital One will be served via ECF.

Dated: May 3, 2019

s/ Patrick Strawbridge