

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SCOTT STEPHENS,	: Case No. 1:15-cv-02217-ENV-LB
	:
Plaintiff,	: DECLARATION OF
	: MATTHEW R. MARON IN
-against-	: SUPPORT OF DEFENDANTS'
	: MOTION TO
TRUMP ORGANIZATION LLC,	: <u>DISMISS COMPLAINT</u>
DONALD J. TRUMP, ALAN GARTEN,	:
and MICHAEL COHEN,	:
	: <u>Date of Service: August 3, 2015</u>
Defendants.	:
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I, Matthew R. Maron, declare as follows:

1. I am Assistant General Counsel-Litigation for The Trump Organization, attorney for Defendants Trump Organization LLC, Donald J. Trump, Alan Garten and Michael Cohen. I respectfully submit this declaration to place before the Court documents cited in Defendants' Memorandum of Law in Support of Motion to Dismiss Complaint.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Complaint in this action, dated and filed on April 19, 2015.

3. Attached hereto as Exhibit 2 is a true and correct copy of defendant Donald J. Trump's Complaint (with exhibits) filed with the World Intellectual Property Organization Arbitration and Mediation Center entitled *Trump v. Stephens*, Case No. D 2015-0478 (the "WIPO Proceeding").

4. Attached hereto as Exhibit 3 is a true and correct copy of the decision of the Administrative Panel in the WIPO Proceeding, dated May 8, 2015.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
August 3, 2015



MATTHEW R. MARON