

1 HARDER LLP
2 CHARLES J. HARDER (CA Bar No. 184593)
3 RYAN J. STONEROCK (CA Bar No. 247132)
4 132 S. Rodeo Drive, Fourth Floor
5 Beverly Hills, California 90212
6 Telephone: (424) 203-1600
7 Facsimile: (424) 203-1601
8 Email: CHarder@HarderLLP.com
9 Email: RStonerock@HarderLLP.com

10 Attorneys for Defendant
11 DONALD J. TRUMP

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 STEPHANIE CLIFFORD a.k.a.
15 STORMY DANIELS a.k.a. PEGGY
16 PETERSON, an individual,

17 Plaintiff,

18 v.

19 DONALD J. TRUMP a.k.a. DAVID
20 DENNISON, an individual,
21 ESSENTIAL CONSULTANTS, LLC, a
22 Delaware Limited Liability Company,
23 and DOES 1 through 10, inclusive,

24 Defendants.

Case No. 2:18-CV-02217

[Removal from Superior Court of
California, County of Los Angeles,
Case No. BC696568]

**JOINDER OF DEFENDANT
DONALD J. TRUMP
IN NOTICE OF REMOVAL OF
ACTION BY DEFENDANT
ESSENTIAL CONSULTANTS, LLC**

Action Filed: March 6, 2018

1 Defendant Donald J. Trump hereby joins in defendant Essential Consultants,
2 LLC's ("EC") Notice of Removal to this Court of the state court action described in
3 said Notice of Removal. Mr. Trump is, and at the time of the Complaint being filed
4 and all intervening times was, a resident of the District of Columbia, and is a
5 permanent resident, citizen and domiciliary of the State of New York. Mr. Trump is
6 not now, and was not at the time of the Complaint being filed or during any
7 intervening times, a citizen of the State of California or a citizen of the State of Texas.

8 This action arises out of allegations made by Plaintiff Clifford, an adult-film
9 actress and exotic dancer, against EC and Mr. Trump, and a written settlement
10 agreement related thereto that contains a broad arbitration provision (the "Arbitration
11 Agreement"). Mr. Trump intends to join in EC's anticipated Petition to Compel
12 Arbitration under the Arbitration Agreement.

13 Mr. Trump intends to pursue his rights to the fullest extent permitted by law.

14 Mr. Trump has not been served with the summons or complaint in this action.
15

16 Dated: March 16, 2018

HARDER LLP

17
18 By: /s/ Charles J. Harder

CHARLES J. HARDER

Attorneys for Defendant

DONALD J. TRUMP
19
20
21
22
23
24
25
26
27
28