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a.k.a. Stormy Daniels a.k.a. Peggy Peterson

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

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

Plaintiff,

vs.

DONALD J. TRUMP a.k.a. DAVID DENNISON, and individual, ESSENTIAL CONSULTANTS, LLC, a Delaware Limited Liability Company, MICHAEL COHEN and DOES 1 through 10, inclusive,

Defendants.

CASE NO.: 2:18-cv-02217-SJO-FFM

PLAINTIFF'S NOTICE OF MOTION AND RENEWED MOTION FOR EXPEDITED JURY TRIAL PURSUANT TO SECTION 4 OF THE FEDERAL ARBITRATION ACT, AND FOR LIMITED EXPEDITED DISCOVERY

Hearing Date: May 7, 2018
Hearing Time: 10:00 a.m.
Location: Courtroom 10C

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on May 7, 2018, in Courtroom 10C of the above-referenced Court, Plaintiff Stephanie Clifford a.k.a. Stormy Daniels a.k.a. Peggy Peterson ("Plaintiff") will and does hereby move this Court for the following relief.

First, Plaintiff seeks an order pursuant to section 4 of the Federal Arbitration Act (9 U.S.C. § 4) setting a summary jury trial on a date that is convenient to the Court. The jury trial is requested regarding whether the subject agreement at issue in the case (the "Settlement Agreement") was formed, or ever existed, between the parties.

Second, Plaintiff seeks an order granting her leave to conduct limited expedited discovery in connection with opposing defendant Essential Consultants, LLC's motion to compel arbitration and to present evidence in support of her position at the aforementioned trial pursuant to 9 U.S.C. § 4. Specifically, Plaintiff requests: (1) a deposition of defendant Donald J. Trump of no greater than two (2) hours, (2) a deposition of defendant Michael Cohen of no greater than two (2) hours, and (3) no more than ten (10) targeted requests for production of documents directed to Mr. Trump and Mr. Cohen on various topics relating to the Settlement Agreement.

Plaintiff bases this motion upon this Notice of Motion; the concurrently filed Memorandum in Support of Plaintiff's Renewed Motion for Expedited Jury Trial Pursuant to Section 4 of the Federal Arbitration Act, and For Limited Expedited Discovery, the Declaration of Michael J. Avenatti in Support of Plaintiff's Renewed Motion for Expedited Jury Trial Pursuant to Section 4 of the Federal Arbitration Act, and For Limited Expedited Discovery, the pleadings and record in this action; and such further argument and evidence as this Court may consider at or before the hearing on this motion.

This Motion is made following the conference of counsel pursuant to Local Rule 7-3 which took place on March 21, 2018 regarding issues relating to the motion, and further communications between counsel. [See Declaration of Michael Avenatti.]

Dated: April 8, 2018

AVENATTI & ASSOCIATES, APC

By: /s/ Michael J. Avenatti

Michael J. Avenatti
Attorneys for Plaintiff Stephanie Clifford
a.k.a. Stormy Daniels a.k.a. Peggy Peterson