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a.k.a. Stormy Daniels a.k.a. Peggy Peterson
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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

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

15 Plaintiff,

16 vs.

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

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

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

Hearing Date: April 30, 2018

Hearing Time: 10:00 a.m.

Location: Courtroom 10C

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE THAT on April 30, 2018, in Courtroom 10C of the
3 above-referenced Court, Plaintiff Stephanie Clifford a.k.a. Stormy Daniels a.k.a. Peggy
4 Peterson (“Plaintiff”) will and does hereby move this Court for the following relief.

5 First, Plaintiff seeks an order pursuant to section 4 of the Federal Arbitration Act (9
6 U.S.C. § 4) setting a summary jury trial no later than 90 days from the date of the Court’s
7 order deciding this Motion, or as soon thereafter as is convenient to the Court. The jury
8 trial is requested regarding whether the subject agreement at issue in the case (the “Hush
9 Agreement”) was formed, or ever existed, between the parties.

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

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

25 This Motion is made following the conference of counsel pursuant to Local Rule 7-
26 3 which took place on March 21, 2018 regarding issues relating to the motion, and further
27 communications between counsel. [See Declaration of Michael Avenatti Decl., ¶6.]
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Dated: March 28, 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