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December 12, 2018

By NYSCEF

Hon. Arlene P. Bluth, J.S.C.  
Supreme Court, New York County  
60 Centre Street, Room 432  
New York, NY 10007

**Re: Denson v. Donald J. Trump for President, Inc.**  
**Index No. 101616/17**

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Dear Justice Bluth:

This office represents plaintiff Jessica Denson in the referenced action, along with co-counsel The Law Offices of David K. Bowles, PLLC. We write to inform the Court of a recent development in the arbitration proceeding captioned Donald J. Trump for President, Inc. v. Denson, American Arbitration Association (“AAA”) Case No. 01-17-0007-6454 (the “Arbitration”) relevant to the Court’s Order to Show Cause (“OSC”) of December 4, 2018 (copy attached as Exhibit A). In short, the arbitrator has issued his final award (the “Final Award”) against Ms. Denson, and the OSC contemplates the Court’s consideration of vacatur of that final award. A copy of the Final Award is attached as Exhibit B.

The OSC directs the defendant Trump Campaign to show cause “[w]hy the partial arbitration award issued in the [Arbitration] ... *and any other award thereunder*, should not be vacated pursuant to CPLR 7511” (emphasis added). As the Final Award is an “other award thereunder,” *i.e.* an award issued in the same challenged arbitration proceeding, and as the Final Award contains no substantive analysis beyond that of the Partial Award, it should be vacated on the instant motion for the reasons set forth in Ms. Denson’s supporting papers.

Ms. Denson therefore respectfully requests, in accordance with the OSC, that the Court vacate the Final Award in the Arbitration along with the Partial Award.

Respectfully submitted,



Maury B. Josephson

Attachments

cc: Lawrence S. Rosen, Esq. (via email)  
Patrick T. McPartland, Esq. (via email)  
David K. Bowles, Esq. (via email)