

**In the Supreme Court of the United States**

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DONALD J. TRUMP; THE TRUMP ORGANIZATION, INC.; TRUMP ORGANIZATION LLC; THE TRUMP CORPORATION; DJT HOLDINGS LLC; THE DONALD J. TRUMP REVOCABLE TRUST; AND TRUMP OLD POST OFFICE LLC,

*Applicants,*

v.

MAZARS USA, LLP; COMMITTEE ON OVERSIGHT AND REFORM OF THE U.S. HOUSE OF REPRESENTATIVES,

*Respondents.*

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DONALD J. TRUMP; DONALD J. TRUMP, JR.; ERIC TRUMP; IVANKA TRUMP; DONALD J. TRUMP REVOCABLE TRUST; TRUMP ORGANIZATION, INC.; TRUMP ORGANIZATION LLC; DJT HOLDINGS LLC; DJT MANAGING MEMBER LLC; TRUMP ACQUISITION LLC; TRUMP ACQUISITION, CORP.,

*Applicants,*

v.

DEUTSCHE BANK AG; CAPITAL ONE FINANCIAL CORPORATION; COMMITTEE ON FINANCIAL SERVICES OF THE UNITED STATES HOUSE OF REPRESENTATIVES; PERMANENT SELECT COMMITTEE ON INTELLIGENCE OF THE UNITED STATES HOUSE OF REPRESENTATIVES,

*Respondents.*

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**PETITIONERS' APPLICATION FOR LEAVE TO EXCEED WORD LIMITS  
IN PETITIONERS' BRIEFS ON THE MERITS**

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## **CORPORATE DISCLOSURE STATEMENT**

Per Supreme Court Rule 29, Applicant-Petitioners The Trump Organization, Inc., Trump Organization LLC, DJT Holdings LLC, The Trump Corporation, Trump Old Post Office LLC, DJT Managing Member LLC, Trump Acquisition LLC, and Trump Acquisition, Corp. state that they have no parent companies or publicly-held companies with a 10% or greater ownership interest in them.

To the Honorable John G. Roberts, Jr., Chief Justice of the United States and Circuit Justice for the District of Columbia Circuit:

For the reasons stated below, Petitioners respectfully request leave to file a brief on the merits in excess of the word limit set forth in Supreme Court Rule 33.1(g)(v), not to exceed 19,000 words, and a reply brief on the merits in excess of the word limit set forth in Supreme Court Rule 33.1(g)(vii), not to exceed 9,000 words.

1. The *Mazars* Petitioners filed a petition for writ of certiorari in No. 19-715 on December 4, 2019.

2. The *Deutsche Bank* Petitioners filed an emergency application for stay in No. 19-760 (19A640) on December 6, 2019.

3. On December 13, 2019, the Court granted the *Mazars* petition (No. 19-715), treated the *Deutsche Bank* application as a petition for a writ of certiorari (No. 19-760), and granted that petition as well. The Court's order consolidated Nos. 19-715 and 19-760 and allotted a total of one hour for oral argument.

4. Petitioners intend to file a single brief on the merits and a single reply brief on the merits in the consolidated appeals.

5. Although the two appeals present overlapping legal issues, they arise out of separate (lengthy) decisions and involve particularized factual backgrounds. To adequately address these differences, Petitioners respectfully request leave to file a brief on the merits in excess of the 13,000-word limit imposed by Supreme Court Rule 33.1(g)(v), not to exceed 19,000 words. For the same reasons, Petitioners

respectfully request leave to file a reply brief on the merits in excess of the 6,000-word limit imposed by Supreme Court Rule 33.1(g)(vii), not to exceed 9,000 words.

6. Counsel for Petitioners has conferred with counsel for Respondents. Respondents Committee on Oversight and Reform, Committee on Financial Services, and Permanent Select Committee on Intelligence take the position that consolidated briefing is appropriate, but that the parties' opening briefs should not exceed 15,000 words and Petitioners' reply brief should not exceed 7,000 words. Respondents Mazars USA, LLP, Deutsche Bank AG, and Capital One Financial Corporation take no position on this application.

January 7, 2020

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Respectfully submitted,

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