

Exhibit B

Charles Harder

From: Charles Harder
Sent: Thursday, June 25, 2020 1:54 PM
To: Champion, Anne; Boutrous Jr., Theodore J.; McGill, Matthew D.; McNamara, Elizabeth; Bolger, Kate
Cc: James D. Kiley; Dilan Esper
Subject: Ex Parte Notice

Dear Counsel:

As you know, we represent Robert S. Trump. Please be advised that we intend to move forthwith for a temporary restraining order in the New York Supreme Court, Nassau County against your respective clients, Mary L. Trump and Simon & Schuster, Inc., in connection with their intent to publish *Too Much and Never Enough: How My Family Created the World's Most Dangerous Man*, which contains alleged descriptions and accounts of Mary Trump's relationship with members of her family, in violation of the Settlement Agreement dated April 10, 2001.

As a courtesy, we will transmit a copy of the papers to you as soon as they are filed.

Sincerely,

Charles J. Harder, Esq.

**CHARLES J. HARDER**

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any and all copies thereof (including any attachments) without reading them or saving them in any manner. Thank you.

James D. Kiley

From: Charles Harder <charder@harderllp.com>
Sent: Friday, June 26, 2020 2:25 AM
To: Champion, Anne; Boutrous Jr., Theodore J.; McGill, Matthew D.; McNarnara, Elizabeth; Bolger, Kate
Cc: James D. Kiley; Weis@sayeghlaw.com; wgs@sayeghlaw.com; Dilan Esper
Subject: Ex Parte Notice

Dear Counsel:

As you know, we represent Robert S. Trump. Please be advised that we intend to move forthwith for a temporary restraining order in the New York Supreme Court, Dutchess County against your respective clients, Mary L. Trump and Simon & Schuster, Inc., in connection with their intent to publish *Too Much and Never Enough: How My Family Created the World's Most Dangerous Man*, which contains alleged descriptions and accounts of Mary Trump's relationship with members of her family, in violation of the settlement agreement dated April 10, 2001.

As a courtesy, we will transmit a copy of the papers to you as soon as they are filed.

Please note that this is essentially the same *ex parte* notice that I provided your clients, via their counsel, on Monday, **June 22**, 2020 at 5:43 pm Eastern time, after which we served with court papers on Tuesday, **June 23**, 2020, that are substantially similar to the papers we will be filing in Dutchess County Supreme Court shortly. (Those earlier court papers, as you know, were filed in Queens County Surrogate's Court, pursuant to the terms of the underlying agreement, and said Court ruled on Thursday, **June 25**, 2020, that the Surrogate's Court lacked jurisdiction and invited my client to file his claim in New York Supreme Court, which we are now doing.)

We understand that you will be opposing our request for a TRO and Motion for Preliminary Injunction. We also acknowledge that you have requested to be heard on any application for a TRO or an Order to Show Cause for the same and that we provide you with notice so that you can participate. We will do our best to accommodate your requests. Naturally, all of our client's rights are reserved and none are waived.

Sincerely,

Charles J. Harder, Esq.



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Editor and Co-Author, ENTERTAINMENT LAW & LITIGATION (LexisNexis 2011-2020)

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