

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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MOTION FOR A MORE DEFINITE  
STATEMENT

UNITED STATES OF AMERICA

-against-

Civ. Action File  
No. 73 C 1529

FRED C. TRUMP, DONALD TRUMP  
and TRUMP MANAGEMENT, INC.

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Defendants in the above entitled cause hereby separately and severally move the Court pursuant to the provisions of Rule 12(e) of the Federal Rules of Civil Procedure for the District Courts of the United States that the plaintiff be ordered to furnish a more definite statement with respect to matters alleged in the Complaint herein in each of the following particulars:

1. That with respect to the allegations contained in paragraph 5, page 2 of the complaint plaintiff be required to state the facts supporting their conclusion that defendants violated the Fair Housing Act of 1968, 42 U.S.C. 3604(a), (b), (c) and (d) in the following respects:

- (a) name the employees and agents alleged to have carried out the discrimination for the defendants;
- (b) the exact addresses and locations of the apartment building at which the alleged discrimination occurred;
- (c) the parties to the alleged discrimination;
- (d) the time, giving exact dates, that the alleged discrimination occurred.

2. That with respect to the allegations contained in paragraph 6 page 3 in the complaint, that the plaintiff be required to state the facts supporting the allegations contained in paragraph SIXTH in the following respects:

- (a) name the employees and agents alleged to have carried out the discrimination for the defendants;
- (b) the exact addresses and locations of the apartment building at which the alleged discrimination occurred;
- (c) the parties to the alleged discrimination;
- (d) the time, giving exact dates, that the alleged discrimination occurred.

Dated: New York, New York  
December 7, 1973

Saxe, Bacon, Bolan & Manley  
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