

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

EDMOND GRANT p/k/a “EDDY GRANT”,  
GREENHEART MUSIC LIMITED, a United  
Kingdom Limited Company, and  
GREENHEART MUSIC LIMITED, an  
Antigua and Barbuda Limited Company,

Plaintiffs,

v.

DONALD J. TRUMP and DONALD J.  
TRUMP FOR PRESIDENT, INC.,

Defendants.

Civil Case No. 1:20-cv-07103-JGK

**DECLARATION OF JASON H.  
KASNER IN SUPPORT OF  
APPLICATION TO  
WITHDRAW AS COUNSEL**

Jason H. Kasner declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the Bar of this Court and a partner at the law firm Peroff Saunders P.C. (the “Firm”), counsel to Defendants in this action. I make this Declaration in support of the Firm’s motion for an order, under Local Civil Rule 1.4, relieving the Firm as counsel in this action.

2. As of January 2, 2024, the firm will no longer be offering legal services and I and my partner Mark Peroff, along with most of our staff, will be joining the law firm Lerner David LLP (“LD”).

3. After careful consideration and for various internal reasons, LD has decided not to take on the instant litigation.

4. I, and my partner Mark Peroff, have been in touch with the Defendants who have already appointed new counsel, Mr. Jesse R. Binnall, Esq. of the Binnall Law Group, to represent them in the instant matter.

5. Mr. Binnall and his firm have represented President Trump and his associated

companies in many litigation matters and are highly trained litigators.

6. As of the date of this Declaration, the Firm has transferred all files in its possession to Mr. Binnell and his firm and I have personally briefed Mr. Binnell on the case, including all historical filings, the disposition of the case currently, and all remaining points to consider moving forward.

7. It is my opinion that Mr. Binnell will have no issues getting up to speed on the case and his firm taking over representation of the Defendants will not cause any undue delay, especially as there are no impending deadlines at this stage of the litigation.

8. Last, Mr. Saunders is also noticed as an attorney on this matter and is no longer part of the Firm. We request he be removed as counsel from this matter as well.

9. Per Local Civil Rule 1.4, I add the following: As to the posture of the case, discovery is complete and the case is not on the Court's calendar. We are not asserting a retaining or a charging lien. I will serve this application to withdraw upon the clients and (by ECF) upon all other parties. I sent notice via email of this motion to Plaintiffs' counsel on December 28, 2023.

10. Accordingly, we respectfully request that the Court enter an order relieving this Firm as counsel to Defendants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: New York, New York  
December 29, 2023

/s/ Jason H. Kasner  
Jason H. Kasner