

<b>UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY</b>	
<b>BROWN &amp; CONNERY, LLP</b> Paul A. Mainardi (PM6453) Donald K. Ludman (DL9973) 6 North Broad Street, Suite 100 Woodbury, NJ 08096 (856) 812-8900 (856) 853-9933 (facsimile) pmainardi@brownconnery.com dludman@brownconnery.com	
<b>-and-</b>	
<b>KASOWITZ, BENSON, TORRES &amp; FRIEDMAN LLP</b> David M. Friedman ( <i>pro hac vice</i> ) Adam L. Shiff ( <i>pro hac vice</i> ) Robert M. Novick ( <i>pro hac vice</i> ) Daniel N. Zinman Daniel A. Fliman ( <i>pro hac vice</i> ) 1633 Broadway New York, New York 10019 (212) 506-1700 (212) 506-1800 (facsimile) dfriedman@kasowitz.com ashiff@kasowitz.com rnovick@kasowitz.com dzinman@kasowitz.com dfliman@kasowitz.com  <i>Attorneys for Donald J. Trump</i>	
In re:  TCI 2 HOLDINGS, LLC, <u>et al.</u> ,  Debtors.	CHAPTER 11  Case No. 09-13654 (JHW)  Jointly Administered

**VERIFIED STATEMENT OF KASOWITZ, BENSON, TORRES & FRIEDMAN LLP  
AND BROWN & CONNERY LLP PURSUANT TO BANKRUPTCY RULE 2019(a)**

Kasowitz, Benson, Torres & Friedman LLP (“KBT&F”) and Brown & Connery LLP (“B&C”), submits this joint verified statement (“Verified Statement”) pursuant to Federal Rule of Bankruptcy Procedure 2019(a), and state as follows:

1. KBT&F and B&C have been retained as counsel to Donald J. Trump (“Mr. Trump”) and Ivanka Trump (“Ms. Trump”) in connection with the chapter 11 cases of the above-captioned jointly administered debtors and debtors in possession (the “Debtors”).

2. As set forth more fully in proofs of claim timely filed against each of the Debtors,<sup>1</sup> Mr. Trump owns claims against the Debtors arising from, among other things, the following agreements (collectively, the “Agreements”) executed in connection with Second Amended Joint Plan of Reorganization, dated as of March 30, 2005, of Trump Hotels & Casino Resorts (“THCR”) (presently known as Trump Entertainment Resorts, Inc. “TER”):

- A. An Amended and Restated Trademark License Agreement, by and among Mr. Trump, TER Holdings, Trump Taj Mahal Associates, LLC, Trump Plaza Associates, Trump Marina Associates, LLC, Trump Indiana, Inc., and TER (for purposes of sections 5.3, 5.4, 9, 10.2.1 and 11), dated May 20, 2005 (the “Trademark License Agreement”).
- B. An Amended and Restated Trademark Security Agreement, by and among Mr. Trump and TER Holdings, dated May 20, 2005 (the “Trademark Security Agreement”).
- C. An Amended and Restated Investment Agreement, by and among Mr. Trump, Trump Hotels & Casino Resorts, Inc. (subsequently, TER), and Trump Hotels & Casino Resorts Holdings, L.P. (subsequently, Trump Entertainment Resorts Holdings, L.P. or “TER Holdings”), dated May 20, 2005 (the “Amended Investment Agreement”).
- D. A Third Amended and Restated Exchange and Registration Rights Agreement, by and among Mr. Trump, TER, TER Holdings, and TCI, dated May 20, 2005 (the “Exchange Agreement”).
- E. A Services Agreement, by and among Mr. Trump, TER, and TER Holdings, dated May 20, 2005 (the “Services Agreement”).
- F. A Voting Agreement, by and among Mr. Trump and TER, dated May 20, 2005 (the “Voting Agreement”).

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<sup>1</sup> Such proofs of claims are incorporated herein by reference.

- G. A Fourth Amended and Restated Agreement of Limited Partnership of Trump Entertainment Resorts Holdings, L.P., by and among TER, Mr. Trump, Trump Casinos, and TCI 2, dated May 20, 2005 (the "Partnership Agreement").

Copies of the agreements are attached to Mr. Trump's proofs of claim on file with the Court. Among other claims, Mr. Trump has claims: (a) of not less than \$100 million for breach of the Trademark License Agreement and related Agreements; (b) for indemnification, subrogation, reimbursement or contribution pursuant to the Amended Investment Agreement, the Exchange Agreement, the Services Agreement and the Trademark License Agreement; (c) for reimbursement or contribution with respect to Directors and Officers Insurance pursuant to, among other things, the Amended Investment Agreement and the Trademark License Agreement; (d) for unpaid amounts due under the Services Agreement; (e) for any unpaid amounts due in connection with Mr. Trump's former position as a member and Chairman of the Board of TER; and (f) for unpaid tax distributions pursuant to the Partnership Agreement in connection with his role as limited partner of TER. In addition, Mr. Trump (a) is the direct owner of 1,297,645 shares of TER common stock, 900 shares of TER class B common stock, and a warrant to purchase 1,446,706 shares of TER common stock, as well as (b) controls ACE Entertainment Holdings Inc., which owns partnership interests in TER Holdings exchangeable for 1,407 shares of TER common stock.

3. As set forth more fully in proofs of claim timely filed against each of the Debtors,<sup>2</sup> Ms. Trump owns claims against the Debtors, including claims for: (a) misappropriation of her image for commercial purposes without her permission; (b) indemnification, subrogation, reimbursement or contribution in connection with her previous role as a member of the Board of Directors of TER; and (c) any unpaid amounts due in connection with her former position as a member of the Board of Directors of TER. In addition, Ms. Trump is an owner of 65,001 shares of common stock in TER, 15,001 of which were granted pursuant to restricted stock awards.

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<sup>2</sup> Such proofs of claims are incorporated herein by reference.

4. Neither Mr. Trump nor Ms. Trump has acquired any claims from any third party creditors of the Debtors.
5. Neither Mr. Trump nor Ms. Trump has any interests in any competitor of the Debtors.
6. Upon information and belief formed after due inquiry, neither KBT&F nor B&C own any claims against or equity interests in the Debtors.
7. KBT&F and B&C reserve the right to revise, to supplement, and to amend this Verified Statement.

The undersigned declare under penalty of perjury that they have read the foregoing and that it is true and correct to the best of their knowledge, information and belief.

Dated: November 13, 2009

**BROWN & CONNERY, LLP**  
Attorneys for Donald J. Trump

By: /s/ Donald K. Ludman  
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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

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*Attorneys for Donald J. Trump*

In re:

TCI 2 HOLDINGS, LLC, et al.,

Debtors.

CHAPTER 11

Case No. 09-13654 (JHW)

Jointly Administered

**CERTIFICATE OF SERVICE**

I, Donald K. Ludman, hereby certify that on this date, I caused a true and correct copy of the Verified Statement of Kasowitz, Benson, Torres & Friedman LLP and Brown & Connery LLP Pursuant to 2019(a) to be served upon counsel via the Electronic Court Filing System, where it is available for viewing, and upon the parties identified in service list annexed hereto as Exhibit A via first class mail.

Dated: November 13, 2009

By: /s/ Donald K. Ludman

**Exhibit A**

Accents/KF Investments D/B/A Accents 2801 Pacific Ave, Ste 220B Atlantic City, NJ 08401	Agilysys NV LLC 1858 Paysphere Circle Chicago, IL 60674
Akin Gump Strauss Hauer & Feld LLP Counsel for Beal Bank Attn: Charles R. Gibbs, Esq. 1700 Pacific Avenue, Suite 4100 Dallas, TX 75201	Akin Gump Strauss Hauer & Feld LLP Counsel for Beal Bank Attn: Scott L. Alberino, Esq. 1333 New Hampshire Avenue, NW Washington, DC 20036
Amerihealth Casualty 1717 Arch Street 45th Floor Philadelphia, PA 19103	Archer & Greiner, P.C. Att: John V. Fiorella, Esq. One Centennial Square Haddonfield, NJ 08033-0968
Atlantic City Linen Supply Inc. 18 N. New Jersey Avenue Atlantic City, NJ 08401	Atlantic Limousine Inc. 130 N. Florida Avenue Atlantic City, NJ 08401
Bally Gaming Inc. 6601 Bermuda Road Las Vegas, NV 89119	Beal Bank Nevada 6000 Legacy Drive Plano, TX 75024
Becker Meisel LLC Att: Ben H. Becker, Esq. 354 Eisenhower Parkway, Suite 2800 Eisenhower Plaza II Livingston, NJ 07039	Becker Meisel LLC Att: Allen J. Underwood II, Esq. 354 Eisenhower Parkway, Suite 2800 Eisenhower Plaza II Livingston, NJ 07039
Bovis Lend Lease, Inc. 821 Alexander Road Princeton, NJ 08540	Buchalter Nemer, PC Atty for Oracle USA & Oracle Credit Corp Attn: Shawn M. Christianson, Esq. 333 Market Street, 25th Fl San Francisco, CA 94105-2126
Casino Control Commission Boardwalk at Tennessee Ave. Arcade Bldg, First Floor Atlantic City, NJ 08401	Casino Reinvestment Development Authority (CRDA Funds) Attn: Paul G. Weiss, Chief Legal Officer 1014 Atlantic Avenue Atlantic City, NJ 08401

Clear Channel Outdoor, Inc. Po Box 402379 Atlanta, GA 30384-2379	Cohen Weiss and Simon LLP Attn: Joseph Vitale, Esquire Babette Ceccotti, Esquire 330 West 42nd Street New York, NY 10036
Cole, Schotz, Meisel, Forman & Leonard Atty for Power Plant Entertainment Att: Irving E. Walker, Esquire Stuart Cherry, Esquire 300 East Lombard Street, Suite 2000 Baltimore, MD 21202	Cole, Schotz, Meisel, Forman & Leonard Attn: Warren A. Usatine, Esquire Felice R. Yudkin, Esquire Court Plaza North 25 Main Street Hackensack, NJ 07602-0800
Connell Foley LLP Atty for Sysco Corporation Attn: Stephen V. Falanga, Esq. 85 Livingston Avenue Roseland, NJ 07068	Conner Strong Companies Inc. 401 Route 73 No. 40 Lake Center Executive Park Marlton, NJ 08053-0989
Cooper Levenson April Niedelman Atty for Cooper Levenson Att: Eric A. Browndorf, Esq. 1125 Atlantic Avenue Atlantic City, NJ 08401	Decotiis, Fitzpatrick, Cole & Wisler Attn: Patricia A. Celano, Esq. 500 Frank W. Burr Blvd., Suite 31 Glen Pointe Centre West Teaneck, NJ 07666
Duane Morris LLP Attn: Frank DiGiacomo Atty for Bally Gaming, Inc. 1940 Route 70 East, Suite 200 Cherry Hill, NJ 08003	Duane Morris LLP Atty for Bally Gaming, Inc. Attn: James J. Vincequerra, Esquire 1540 Broadway New York, NY 10036-4086
Flaster/Greenberg Pc Attn: Douglas S. Stanger, Esq Atty for Best of Life Park 646 Ocean Heights Avenue Linwood, NJ 08221	Flaster/Greenberg Pc Att: Douglas S. Stanger, Esq, Attys for Rachel Annette Ivgi 646 Ocean Heights Ave Linwood, NJ 08221
Folkman Law Offices, P.C. Atty for Joseph and Dolores Colello Att: Benjamin Folkman, Esq. 1949 Berlin Rd # 100 Cherry Hill, NJ 08003-3737	Folkman Law Offices, P.C. Atty for Dolores Colello Att: Benjamin Folkman, Esq. 1949 Berlin Rd# 100 Cherry Hill, NJ 08003-3737



Frances Williams & Lorraine Smith PO Box 2291 Ellicott City, MD 21041	Gibbons P.C. Att: Dale E. Barney, Esquire Mark B. Conlan, Esquire Atty for Verizon Business Network SVCS One Gateway Center Newark, NJ 07102-5310
Harco Industries Inc. USA 333 South Van Brundt Street Englewood, NJ 07631	Haynes and Boone LLP Attn: Trey Monsour, Esquire Jason Binford, Esquire 2323 Victory Avenue, Suite 700 Dallas, TX 75219-7673
Hess Corporation Attn: Richard J. Bindelglass, Esq. Asst. General Counsel-Marketing & Refinin 1 Hess Plaza Woodbridge, NJ 07095	Horizon Blue Cross Blue Shield of New Jersey PO Box 1609 Newark, NJ 07101
Houlihan, Lokey, Howard & Zukin 685 Third Avenue 15th Floor New York, NY 10017	Hunton & Williams LLP Counsel for Beal Bank Attn: Gregory G. Hesse, Esq. 1445 Ross Avenue, Suite 3700 Dallas, TX 75202
IBM Credit LLC Special Handling Group Att: Norbet Cardenas 4111 Northside Parkway Atlanta, GA 30327	IGT, Inc. 9295 Prototype Drive Attn: Gent Culver - Credit Dept Reno, NV 89521
Infoprint Solutions Company LLC Attn: Vicky Namken c/o IBM Corporation 13800 Diplomat Dr Dallas, TX 75234	Internal Revenue Service Attn: General Counsel Insolvency Section 31 Hopkins Plaza, Rm 1150 Baltimore, MD 21201
International Business Machines Corp IBM Credit LLC Attn: Vicky Namken 13800 Diplomat Dr Dallas, TX 75234	International Union, UAW Attn: Niraj Ganatra 8000 East Jefferson Avenue Detroit, MI 48214

<p>J. Scott Douglass, Esquire                  909 Fannin, Suite 1800                  Houston, TX 77010</p>	<p>Jeffrey V. Mcgee                  P.O. Box 3877                  Jackson, GA 30233-0078</p>
<p>Jennings Sigmond P.C.                  Att: Dawn M. Costa, Esq.                  510 Walnut St                  The Penn Mutual Towers, 16th Floor                  Philadelphia, PA 19106</p>	<p>Kelley Drye &amp; Warren LLP                  Atty for U.S. Bank National Association                  Attn: Mark W. Page, Esq.                  333 W. Wacker Drive, Floor 26                  Chicago, Il 60606</p>
<p>Law Office of Gerald W. Berger                  Attn: Gerald W. Berger, Esq.                  106 S. Main Street, Suite 2500                  First National Tower                  Akron, OH 44308-1447</p>	<p>Law Offices of Gabriel Del Virginia                  Atty for Hess Corporation                  Attn: Gabriel Del Virginia, Esq.                  488 Madison Ave FL 19                  New York, NY 10022-5706</p>
<p>Lombardi and Lombardi                  Attn: Paul R. Garelick, Esq.                  1862 Oak Tree Road                  P.O. Box 2065                  Edison, NJ 08818-2065</p>	<p>Lowenstein Sandler PC                  Attn: Kenneth Rosen, Esquire                  Jeffrey Prol, Esquire                  Jeff Kramer, Esquire                  65 Livingston Avenue                  Roseland, NJ 07068</p>
<p>Lowenstein Sandler PC                  Attn: Michael S. Etkin, Esquire                  Eric H. Horn, Esquire                  Atty for Reliant Energy, Reliant Retail                  65 Livingston Avenue                  Roseland, NJ 07068</p>	<p>McCarter &amp; English                  Attn: Charles A Stanziale Jr., Esquire                  Joseph Lubertazzi, Esquire                  Lisa S. Bonsall, Esquire                  100 Mulberry Street                  Newark, NJ 07102</p>
<p>MTM Sales Corp                  PO Box 300 923                  Brooklyn, NY 11230</p>	<p>National Labor Relations Board- Region 4                  Att: Dorothy Moore Duncan, Regional Dir.                  Carmen P. Ciallno, Jr., Esquire                  615 Chestnut Street, Seventh Floor                  Philadelphia, PA 19106</p>
<p>New Jersey Corporation Tax                  NJ Division of Taxation                  Corp. Business Tax                  P.O. Box 257                  Trenton, NJ 08646</p>	<p>NJ Dept of Treasury                  Div of Taxation, Attn: Bankruptcy                  50 Barracks Street                  Po Box 245                  Trenton, NJ 08625</p>
<p>NJ Office of The Attorney General                  Div of Law, Bankruptcy Dept.                  25 Market Street, 3rd Floor                  Trenton, NJ 08625</p>	<p>Obryan Baun Cohen Kuebler                  Atty for Catherine Rodriguez                  Att: Howard M. Cohen, Esq.                  401 S. Old Woodward, Suite 450                  Birmingham, MI 48009</p>

<p>Office of The United States Trustee                  District of New Jersey                  Attn: Jeff Sponder, Esq.                  One Newark Center, Suite 2100                  Newark, NJ 07102</p>	<p>Otis Elevator Co.                  P.O. Box 13716                  Newark, NJ 07188</p>
<p>Office of Milton H. Pachter                  Atty for Port Authority Of NY/NJ                  Attn: Jay A. Selcov, Esq                  225 Park Ave So., 13th Floor                  New York, NY 10003</p>	<p>Robinson Brog Leinwand Greene                  Genovese &amp; Gluck, P.C.                  Atty for Ciminellos                  Attn: Robert M Sasloff                  1345 Avenue of The Americas, 31 St Fl                  New York, NY 10105-0143</p>
<p>Securities &amp; Exchange Commission                  Northeast Regional Office                  Mark Schonfeld, Regional Director                  3 World Financial Centers, Rm 4300                  New York, NY 10281</p>	<p>Securities and Exchange Commission                  Katherine Gresham, Asst. Gen Counsel                  Michael Berman, Asst General Counsel                  100 F Street, NE                  Washington, DC 20549</p>
<p>Sheppard Mullin Richter &amp; Hampton LLP                  Atnt: E Tillinghast, III, Esquire                  Malani J. Cademartori, Esquire                  Sean J. Kirby, Esquire                  Atty for New Century Investment Partners                  30 Rockefeller Plaza, 24th Floor                  New York, NY 10112</p>	<p>Stroock &amp; Stroock &amp; Lavan LLP                  Attn: Kristopher M. Hansen, Esquire                  Erez E. Gilad, Esquire                  Kenneth Pasquale, Esquire                  180 Maiden Lane                  New York, NY 10038</p>
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<p>Teich Groh                  Counsel for Beal Bank                  Att: Brian W. Hofmeister, Esq.                  691 State Highway 33                  Trenton, NJ 08619</p>	<p>The Nasdaq Stock Market LLC                  One Liberty Plaza                  New York, NY 10006</p>
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White & Case LLP Attn: Matthew C. Brown, Esquire Thomas E. Lauria, Esquire Atty for Beal Bank Wachovia Financial Center, Suite 4900 200 South Buscayne Blvd. Miami, FL 33131-2352	White & Case LLP Attn: Eric K. Stodola, Esquire Gerard H. Uzzi, Esquire Atty for Beal Bank 1155 Avenue of The Americas New York, NY 10036-2787
WMS Gaming Inc T/A Williams Attn: Accounts Receivable 800 South Northpoint Blvd Waukegan, IL 60085	Wolff & Samson PC Attn: David N. Ravin, Esq. Carlos G. Manalansan, Esq. Atty for Plaza Hotel Management Co One Boland Drive West Orange, NJ 07052

## General Information

<b>Court</b>	United States Bankruptcy Court for the District of New Jersey; United States Bankruptcy Court for the District of New Jersey
<b>Docket Number</b>	1:09-bk-13654
<b>Status</b>	Closed