

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<p>RUBY FREEMAN, <i>et al.</i>,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>RUDOLPH W. GIULIANI,</p> <p style="text-align: center;">Defendants.</p>
---

Civil Action No. 21-3354 (BAH)

Judge Beryl A. Howell

**RESPONSE TO MINUTE ORDER RE OBJECTIONS TO EXHIBITS**

Per the Court’s Minute Order dated December 11, 2023, Defendant Rudolph Giuliani (“Giuliani”) hereby provides the following response to the Court:

**A. Conditional Objections.**

At trial, the Court indicated Defendant’s counsel did not need to continue making objections to evidence on the same grounds that he raised in Documents 110 and 114. Therefore, based on the current “law of the case”, Giuliani did not object to Plaintiff’s exhibits offered at trial. However, the Court then requested that Giuliani’s conditional objections (in other words, objections that would have been made had the Court granted Giuliani’s objections lodged in Documents 110 and 114) needed to be put on the record.

Giuliani makes these objections as follows:

<b>Exhibit Number</b>	<b>Conditional Objection</b>
PTX 335-338	FRE 402, 403
PTX 523	FRE 402, 403

PTX 234	FRE 402, 403
PTX 312	FRE 402, 403
PTX 336	FRE 402, 403

**A. Additional Objections After Eliciting Testimony From Regina Scott.**

Upon examining Regina Scott, Giuliani contends that her testimony revealed that her testimony and the contents of the documents generated by Jensen Hughes were really undisclosed expert reports in disguise and objects to the following exhibits previously admitted because they were relied on by Plaintiffs' disclosed expert, Dr. Humphries: PTX-428; PTX-456; PTX-466; PTX-554. Giuliani objects to these exhibits under FRE 702 and FRCP 37, which creates and automatic exclusion of undisclosed expert testimony and materials.

Date: December 12, 2023

Respectfully submitted,

By: /s/ Joseph D. Sibley IV

CAMARA & SIBLEY L.L.P.

Joseph D. Sibley IV  
DC Bar ID: TX0202  
1108 Lavaca St.  
Suite 110263  
Austin, TX 78701

Telephone: (713) 966-6789  
Fax: (713) 583-1131  
Email: [sibley@camarasibley.com](mailto:sibley@camarasibley.com)

**ATTORNEYS FOR RUDOLPH GIULIANI**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of December, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which I understand to have caused service on all counsel of record.

*/s/ Joseph D. Sibley IV*

Joseph D. Sibley IV