

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

<p>RUBY FREEMAN</p> <p><i>and</i></p> <p>WANDREA' MOSS,</p> <p><i>Plaintiffs,</i></p> <p>v.</p> <p>RUDOLPH W. GIULIANI,</p> <p><i>Defendant.</i></p>	<p>Civil Action No. 21-3354 (BAH)</p> <p>Judge Beryl A. Howell</p>
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[PROPOSED] STIPULATED ORDER ON TRIAL TRANSCRIPT REDACTIONS

IT IS HEREBY STIPULATED AND AGREED by and between the Parties to this Action that:

WHEREAS, on the morning of December 14, 2023, during the charging conference of the trial in the above captioned case, counsel for the Plaintiffs requested that the Court redact portions of the trial transcript consisting of a bench conference during the December 12, 2023 Afternoon Session;

WHEREAS, the Court granted that motion and ordered that redaction, as reflected on pages 32:7–33:21 of the transcript from the December 14, 2023 Morning Session;

WHEREAS, in discussing Plaintiffs' request, the contents of the bench conference were mentioned, as reflected on page 33, lines 4 and 9 of the transcript for the December 14, 2023 Morning Session;

WHEREAS the Parties jointly stipulate, agree, and hereby request that the Court order redacted those additional limited portions of the trial transcript from the December 14, 2023 Morning Session, for the same reasons that justified the underlying redaction request;

WHEREAS the Parties jointly request that the Court redact the following portions of page 33 of the trial transcript from the December 14, 2023 Morning Session:

- (1) the last three words in line 4 (33:4); and
- (2) the seventh and eighth words in line 9, (33:9);

THEREFORE, IT IS HEREBY STIPULATED BY THE PARTIES, ACTING THROUGH THEIR UNDERSIGNED COUNSEL that the parties consent that an order be entered redacting the following portions of page 33 of the transcript from the December 14, 2023 Morning Session of the trial in the above captioned case:

- (1) the last three words in line 4 (33:4); and
- (2) the seventh and eighth words in line 9, (33:9).

DATED: June 28, 2024

/s/ Michael J. Gottlieb

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Attorney for Defendant Rudolph W. Giuliani

SO ORDERED.

Date: _____

Hon. Beryl A. Howell, United States District Judge
United States District Court for the District of Columbia