

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 23-cv-3754-BAH

NOTICE OF ADDITIONAL INFORMATION IN SUPPORT OF PLAINTIFFS'
MOTION FOR CIVIL CONTEMPT

Plaintiffs Ruby Freeman and Wandrea' Moss respectfully submit this notice of additional information that came to the attention of Plaintiffs as they were preparing for the hearing regarding their Motion for Civil Contempt ("Motion") and reply in support thereof. ECF Nos. 19, 35. Plaintiffs submit that this information is relevant to the Court's consideration of the Motion, particularly in light of Defendant's argument that:

If Giuliani were bent on violating the Consent Judgment, Plaintiffs and their army of lawyers would have found more than the handful of statements they themselves concede only 'indirectly' relate to Plaintiffs. In the overall context of Giuliani's substantial podcast output, the few seconds Giuliani has devoted to his opinions in the *Freeman I* case represent, if anything, a *de minimis* violation.

ECF No. 34 at 14.

On November 19, 2024, Defendant Giuliani aired another episode of *America's Mayor Live*, titled *America's Mayor Live (542): Live Coverage of Trump Transition 2024: Day 14* where he stated "You know the tapes in at the Arena...***at the State Arena in Atlanta...***uh ***they threw out***

all the people that were observing the vote count, uh closed the doors. All of a sudden um *these two ladies* and several others *shoo everybody out*. Everybody's gone. Close down the Arena.... They make one more casing of the joint, now this is not on the tape anymore, used to be, *casing of the joint* and then all of a sudden they have a covered over table that uh hadn't been used all day to take any ballots out and when nobody was around they pull up, pull up the and *they take five bins out and turn them over to the people counting and you can see them quadruple counting.*” Houghton-Larsen Decl. ¶ 5.

On November 21, 2024, Defendant Giuliani aired another episode of *America's Mayor Live*, titled *America's Mayor Live (544): Live Coverage of Trump Transition 2024: Day 16*, in which he commented on the injunction and the Motion, stating “to hell with it, the minute they started criticizing me *I said it's over... so the hell with it...* I mean Jesus there, it's like a little ridiculous. *I have a video showing them counting votes. I have a video.*” Houghton-Larsen Decl. ¶ 6.

Dated: January 10, 2025

Respectfully submitted,

By: /s/ Michael J. Gottlieb
Michael J. Gottlieb (974960)
Meryl C. Governski (1023549)
WILLKIE FARR & GALLAGHER LLP
1875 K Street NW
Washington, DC 20006
Tel: (202) 303-1000
mgottlieb@willkie.com
mgovernski@willkie.com

Aaron E. Nathan (1047269)
M. Annie Houghton-Larsen*
WILLKIE FARR & GALLAGHER LLP
787 Seventh Avenue
New York, New York 10019
Tel: (212) 728-8904
anathan@willkie.com
mhoughton-larsen@willkie.com

Rachel Goodman*
UNITED TO PROTECT DEMOCRACY, INC.
82 Nassau Street, #601
New York, NY 10038
Tel: (202) 579-4582
rachel.goodman@protectdemocracy.org

Von A. DuBose*
DUBOSE MILLER LLC
75 14th Street NE, Suite 2110
Atlanta, Georgia 30309
Tel: (404) 720-8111
dubose@dubosemiller.com

**Admitted pro hac vice*

Counsel for Plaintiffs