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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RUDOLPH W. GIULIANI
a/k/a RUDOLPH WILLIAM GIULIANI

Debtor.

Chapter 11

Case No. 23-12055 (SHL)

**JOINDER OF THE FREEMAN PLAINTIFFS TO THE
OBJECTIONS OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS TO THE DEBTOR'S (A) AMENDED APPLICATION
FOR RETENTION AND EMPLOYMENT OF CAMARA & SIBLEY, LLP,
(B) AMENDED APPLICATION FOR RETENTION AND EMPLOYMENT
OF AIDALA, BERTUNA & KAMINS, P.C., AND (C) APPLICATION
TO EMPLOY BERGER, FISCHOFF, SHUMER, WEXLER & GOODMAN, LLP**

Ms. Ruby Freeman and Ms. Wandrea' ArShaye "Shaye" Moss (the "Freeman Plaintiffs"),
as creditors and parties-in-interest of Mr. Rudolph W. Giuliani a/k/a Rudolph William Giuliani

(the “Debtor”), by and through their undersigned counsel, hereby submit this joinder to the (a) *Objection of the Official Committee of Unsecured Creditors of Rudolph W. Giuliani to the Debtor’s Amended Application for Retention and Employment of Camara & Sibley, LLP as Special Litigation Counsel Effective December 21, 2023* (the “C&S Objection”) [Docket No. 111] and (b) *Omnibus Objection of the Official Committee of Unsecured Creditors of Rudolph W. Giuliani to (I) Debtor’s Amended Application for Retention and Employment of Aidala, Bertuna & Kamins, P.C. as Special Counsel Effective December 21, 2023 and (II) Application to Employ Berger, Fischhoff, Shumer, Wexler & Goodman, LLP as Attorney for the Debtor* (the “Omnibus Objection”) and, together with the C&S Objection, the “Committee Objections”) [Docket No. 113].¹

JOINDER

1. Mr. Giuliani is seeking to retain three law firms whose legal fees may be fully or partially paid by two separate legal defense funds identified as (a) Giuliani Defense and (b) Giuliani Freedom Fund Legal Defense T.R. Fund (the “Giuliani Freedom Fund”) and, together with Giuliani Defense, the “Legal Defense Funds”). Based on the Debtor’s insufficient disclosures to date, the Court should deny these retention applications. As set forth in the Committee Objections, the three applications suffer from the same flaws. *First*, Mr. Giuliani has not disclosed basic information—specifically the Legal Defense Funds’ sources of funding—to determine whether the Legal Defense Funds would be paying these law firms using estate property. Given the totality of the circumstances—including that Mr. Giuliani’s son is President of Giuliani Defense—it is essential to obtain clarity on how the Legal Defense Funds were themselves funded.

¹ Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to them in the C&S Objection or Omnibus Objection.

Second, when a third party agrees to pay for the legal expenses of a debtor, the arrangement must be fully disclosed so that the Court can properly analyze the extent of any conflicts of interest. *See e.g., In re Lar Dan Enters.*, 221 B.R. 93, 95-96 (Bankr. S.D.N.Y. 1998). Here, there has been completely insufficient disclosure about the exact nature of the relationship between Mr. Giuliani, the Defense Funds, and the three firms he seeks to retain. By failing to disclose these relationships, the Court cannot assess potential conflict issues, and parties in interest cannot determine whether these firms satisfy the Section 327 retention standard. In the absence of additional disclosure, there is an insufficient evidentiary basis for the Court to grant these applications. Accordingly, for the reasons set forth in the Committee Objections, the Court should deny the Amended C&S Application, the Amended ABK Application, and the BFS Application.

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CONCLUSION

WHEREFORE, for the foregoing reasons, the Freeman Plaintiffs join the Committee Objections and respectfully request that the Court deny the relief requested in the Amended C&S Application, the Amended ABK Application, and the BFS Application.

Dated: February 15, 2024

By: /s/ Rachel C. Strickland

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