

**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)

**NOTICE OF DEBTOR'S CONSENT TO DISMISSAL  
AND PROPOSED FORM OF ORDER**

Rudolph W. Giuliani (the "Debtor"), having reviewed the *Objection of Ruby Freeman and Wandrea' ArShaye Moss to Debtor's Application to Convert Chapter 11 to Chapter 7* filed by Ruby Freeman and Wandrea' ArShaye Moss (the "Freeman Plaintiffs") [Docket No. 282] and the *Objection of the Official Committee of Unsecured Creditors to Debtor's Application to Convert Chapter 11 to Chapter 7* filed by the Official Committee of Unsecured Creditors (the "Committee") [Docket No. 281], hereby notifies the Court that the Debtor has changed his position on the appropriate disposition of his pending *Application to Convert Chapter 11 Case to Chapter 7* [Docket No. 277]. The Debtor now requests that the Court grant the relief requested by the Freeman Plaintiffs and dismiss the case in accordance with the form of order attached hereto as **Exhibit A**. Alternatively, the Debtor requests that the chapter 11 case be converted to chapter 7. The Committee has not agreed to the dismissal of this chapter 11 case.

[Signature Page Follows]

/s/ Gary C. Fischhoff

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