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Reply to: Syosset Office
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July 15, 2024

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Via ECF

Honorable Sean H. Lane
United States Bankruptcy Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: Rudolph W. Giuliani
Chapter 11 Case No: 23-12055

Dear Judge Lane:

The Debtor has reviewed the proposed order of dismissal filed jointly by the Freeman Plaintiff's and the Committee. The terms of the proposed order are onerous, punitive and overreaching. The creditors want it both ways, they want the case dismissed while they also exercise complete control over the Debtor.

The disagreement in essence is just about timing. The Debtor does consent to Global Data Risk, LLC placing a lien on the New York City apartment to ensure they are paid the fees awarded by the Court.

We believe the Debtor's filed proposed counter order is consistent with the Court's decision and provides Global with adequate protection.

Respectfully,

Gary C. Fischhoff

cc: Aaron E. Nathan, Esq. – via email
James H. Burbage, Esq. – via email
Rachel Biblo Block, Esq. – via email
Andrea B. Schwartz, Esq. – via email