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July 18, 2024

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:

Pursuant to the Court's directive on July 17, 2024 please allow this letter to serve as an update regarding the resolution of the competing orders of dismissal. The parties have been engaged in extensive negotiations over the last 24 hours and unfortunately, a final resolution has not been reached at this point. The parties are still talking and I am hopeful a joint resolution will be forthcoming shortly.

Respectfully,

Heath S. Berger