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July 18, 2024

**VIA ECF**

Hon. Sean H. Lane  
United States Bankruptcy Court for the Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601-4140

Re: *In re Rudolph W. Giuliani*, No. 23-12055-SHL

Dear Judge Lane:

Ms. Ruby Freeman and Ms. Wandrea' ArShaye Moss (together, the "Freeman Plaintiffs") respectfully submit this response to the Debtor's letter filed at 12:02 p.m. today [Docket No. 301] updating the Court on his so-called "extensive negotiations" with the Freeman Plaintiffs and the Official Committee of Unsecured Creditors (the "Committee").

The parties have been unable to reach a resolution on a form of order for dismissal. Much of the day has been spent with Debtor's counsel trying to reach his client. In light of the Debtor's claims of limited access to cash and new reports of the Debtor, his assistant, and his companion flying first class this week,<sup>1</sup> the Committee and the Freeman Plaintiffs requested additional disclosure from the Debtor regarding his recent expenditures. The Debtor has not provided the requested information.

Respectfully submitted,

/s/ Rachel C. Strickland

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<sup>1</sup> See Katelyn Polantz, *Rudy Giuliani Drains Half of Bank Account For Personal Expenses While Creditors Pursue What He Owes Them*, CNN POL. (July 17, 2024 5:06 P.M.), <https://www.cnn.com/2024/07/17/politics/rudy-giuliani-spending/index.html>.