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Reply to: Syosset Office
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July 19, 2024

Honorable Sean H. Lane
United States Bankruptcy Court
Southern District of New York

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

Dear Judge Lane:

We are in receipt of the letter filed by Ms. Strickland and wish to clarify some issues. The parties were engaged in good faith negotiations in trying to resolve this matter. We provided Ms. Strickland and member of the Committee bank statements as originally requested and made numerous offers to try and resolve the issues.

Contrary to Ms. Strickland's allegations, the day was not spent trying to get in touch with the Debtor. I had been in contact all day with the Debtor which allowed me to make numerous offers to the parties in an attempt to resolve this matter

Respectfully,

Heath S. Berger

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