

July 31, 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

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

Dear Judge Lane:

Debtor Rudolph W. Giuliani (the “Debtor”), creditors Ruby Freeman and Wandrea’ ArShaye Moss (the “Freeman Plaintiffs”), the Official Committee of Unsecured Creditors in the above referenced case (the “Committee”), and Global Data Risk LLC (“GDR,” and collectively with the foregoing, the “Parties”) jointly submit this letter in response to the Court’s Order dated July 25, 2024 (ECF No. 307).

The Parties have conferred and reached agreement on a revised proposed form of order dismissing this case in accordance with the Court’s Memorandum of Decision dated July 12, 2024 (ECF No. 289), which is attached to this letter as **Exhibit A** (the “Revised Dismissal Order”).

Further, undersigned counsel for the Debtor represents that the Dismissal Condition described in Paragraph 3 of the Revised Dismissal Order was satisfied as of July 30, 2024, meaning that dismissal of this case will take effect immediately upon entry of the Revised Dismissal Order.

Respectfully submitted,

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On Behalf of Global Data Risk LLC

*Electronic signatures affixed with
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