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*Counsel to the Official Committee of
Unsecured Creditors of Rudolph W. Giuliani*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		
In re:	:	Chapter 11
	:	
RUDOLPH W. GIULIANI	:	Case No. 23-12055 (SHL)
a/k/a RUDOLPH WILLIAM GIULIANI,	:	
	:	
Debtor.	:	
-----X		

**NOTICE OF FILING OF
REVISED PROPOSED ORDER REGARDING
FINAL FEE APPLICATION OF GLOBAL DATA RISK
LLC, SPECIALIZED FORENSIC FINANCIAL ADVISOR
TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR THE PERIOD FROM FEBRUARY 9, 2024 THROUGH JULY 11, 2024**

PLEASE TAKE NOTICE that, on August 19, 2024, Global Data Risk LLC, specialized forensic financial advisor to the Official Committee of Unsecured Creditors appointed in the chapter 11 case of the above-captioned debtor (the “Debtor”), filed the *Final Fee Application of Global Data Risk LLC, Specialized Forensic Financial Advisor to the Official Committee of Unsecured Creditors for the Period from February 9, 2024 Through July 11, 2024* (the “Application”).

PLEASE TAKE FURTHER NOTICE that, on September 19, 2024, GDR filed a proposed form of order granting the Application [Docket No. 315, Ex. A] (the “Original Proposed Order”).

PLEASE TAKE FURTHER NOTICE that, on September 24, 2024, the Court held a hearing (the “Hearing”) on the Application.

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit A** is a revised proposed order granting the Application (the “Revised Proposed Order”). The Revised Proposed Order incorporates the Court’s ruling at the Hearing and has been circulated to the Debtor’s counsel and the United States Trustee. The Revised Proposed Order incorporates comments received shortly after the Hearing from the Debtor’s counsel and the United States Trustee. The Debtor and the United States Trustee have no objection to the form of the Revised Proposed Order.

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit B** is a redline of the Original Proposed Order against the Revised Proposed Order.

Dated: September 27, 2024
New York, New York

/s/ Philip C. Dublin

AKIN GUMP STRAUSS HAUER & FELD LLP

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*Counsel to the Official Committee of
Unsecured Creditors of Rudolph W. Giuliani*

EXHIBIT A

Revised Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re:	: Chapter 11
	:
RUDOLPH W. GIULIANI	: Case No. 23-12055 (SHL)
a/k/a RUDOLPH WILLIAM GIULIANI,	:
	:
Debtor.	:
-----X	

**ORDER GRANTING FINAL FEE APPLICATION
OF GLOBAL DATA RISK LLC, SPECIALIZED FORENSIC
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR THE PERIOD FROM FEBRUARY 9, 2024 THROUGH JULY 11, 2024**

Upon consideration of the application [Docket No. 310] (the “Application”) of Global Data Risk LLC (“GDR”) for allowance on a final basis of compensation and reimbursement of expenses for professional services rendered and expenses incurred during the period commencing February 9, 2024 through July 11, 2024; and a hearing (if applicable) having been held before this Court to consider the Application; and notice having been given pursuant to Federal Rules of Bankruptcy Procedure 2002(a)(6) and (c)(2); and due consideration having been given to any responses thereto; and sufficient cause having been shown therefor, it is hereby **ORDERED**:

1. The Application is granted on a final basis to the extent set forth in **Schedule A** attached hereto.

2. In accordance with the *Order (I) Dismissing Chapter 11 Case, (II) Establishing Procedures for the Allowance and Payment of Professional Fees; and (III) Granting Related Relief* [Docket No. 309] (the “Dismissal Order”), Berger, Fischhoff, Shumer, Wexler & Goodman, LLP (“BFS”) is authorized and directed upon entry of this Order to remit payment of the Initial

Professional Fee Amount¹ (as defined in the Dismissal Order) to GDR from the funds deposited into BFS's escrow account on behalf of the Debtor in accordance with the Dismissal Order.

3. In accordance with Dismissal Order, the Debtor is authorized and directed upon entry of this Order to remit payment, or facilitate the payment, of the Stub Professional Fee Amount² (as defined in the Dismissal Order) from the proceeds of the first of the following properties of the Debtor to be sold: (A) the NYC Apartment (as defined in the Dismissal Order), and (B) the Florida Condo (as defined in the Dismissal Order), in each case, immediately upon the closing of such sale.

4. This Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2024
New York, New York

THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

¹ Pursuant to the Dismissal Order, the "Initial Professional Fee Amount" means \$100,000.00.

² Pursuant to the Dismissal Order, the "Stub Professional Fee Amount" means GDR's approved fees and expenses in excess of the Initial Professional Fee Amount.

Case No.: 23-12055 (SHL)

Case Name: In re Rudolph W. Giuliani a/k/a Rudolph William Giuliani

Schedule A

Final Fee Application Totals

Applicant	Total Fees Requested	Total Fees to Be Paid	Total Expenses Requested	Total Expenses to Be Paid
Global Data Risk LLC	\$324,843.75	\$300,480.47 ¹	\$6,854.29	\$5,615.10 ²

¹ In response to objections that the United States Trustee raised informally, GDR agreed to voluntarily reduce its fees by \$7,562.50. The Court reduced the total fees to be paid by an additional \$16,800.78.

² In response to objections that the United States Trustee raised informally, GDR agreed to voluntarily reduce its expenses by \$1,239.19.

EXHIBIT B

Redline

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X	
In re:	: Chapter 11
	:
RUDOLPH W. GIULIANI	: Case No. 23-12055 (SHL)
a/k/a RUDOLPH WILLIAM GIULIANI,	:
	:
Debtor.	:
----- X	

**ORDER GRANTING FINAL FEE APPLICATION
OF GLOBAL DATA RISK LLC, SPECIALIZED FORENSIC
FINANCIAL ADVISOR TO THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS FOR THE PERIOD FROM FEBRUARY 9, 2024 THROUGH JULY 11,
2024**

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ORDERED:

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3. In accordance with Dismissal Order, the Debtor is authorized and directed upon entry of this Order to remit payment, or facilitate the payment, of the Stub Professional Fee Amount² (as defined in the Dismissal Order) from the proceeds of the first of the following properties of the Debtor to be sold: (A) the NYC Apartment (as defined in the Dismissal Order), and (B) the Florida Condo (as defined in the Dismissal Order), in each case, immediately upon the closing of such sale.

4. This Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2024
New York, New York

THE HONORABLE SEAN H. LANE
UNITED STATES BANKRUPTCY JUDGE

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² Pursuant to the Dismissal Order, the "Stub Professional Fee Amount" means GDR's approved fees and expenses in excess of the Initial Professional Fee Amount.

Case No.: 23-12055 (SHL)

Case Name: In re Rudolph W. Giuliani a/k/a Rudolph William Giuliani

Schedule A

Final Fee Application Totals

Applicant	Total Fees Requested	Total Fees to Be Paid	Total Expenses Requested	Total Expenses to Be Paid
Global Data Risk LLC	\$324,843.75	\$317,281.25 <u>\$300,480.47¹</u>	\$6,854.29	\$5,615.10 ²

¹ In response to objections that the United States Trustee raised informally, GDR agreed to voluntarily reduce its fees by \$7,562.50. The Court reduced the total fees to be paid by an additional \$16,800.78.

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