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November 7, 2024

Via ECF

Hon. Lewis J. Liman
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Freeman et al. v. Giuliani*, 24-mc-00353-LJL

Dear Judge Liman:

In response to Plaintiffs' motion to compel, ECF 69-70, and the Court's order that Giuliani and Company, LLC; Giuliani Communications, LLC; Giuliani Group, LLC; Giuliani Partners, LLC; Giuliani Security and Safety, LLC; Rudolph W. Giuliani, PLLC; and WorldCapital Payroll Corp (the "Giuliani Entities"), respond to the motion by today, ECF 71, we respectfully request that the court give the Giuliani Entities, until the close of business on Wednesday, November 13, 2024, to respond to Plaintiffs' information subpoenas.

Respectfully submitted,

/s/ Kenneth A. Caruso
Kenneth A. Caruso

cc: Counsel of Record (via ECF)