

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Ruby Freeman and Wandrea' Moss

(List the full name(s) of the plaintiff(s)/petitioner(s).)

24 CV 6563 (LJL) ( )

-against-

NOTICE OF APPEAL

Rudolph W. Giuliani

(List the full name(s) of the defendant(s)/respondent(s).)

Notice is hereby given that the following parties: Defendant Rudolph W. Giuliani

(list the names of all parties who are filing an appeal)

in the above-named case appeal to the United States Court of Appeals for the Second Circuit

from the  judgment  order entered on: January 13, 2025

(date that judgment or order was entered on docket)

that: **The Court, Judge Lewis J. Liman excluded two witnesses from being able to testify at trial on January 16, 2025, to wit: MONSIGNOR ALAN PLACA, and THEODORE GOODMAN who should not have been excluded from testifying. The Order appealed from stated no legal legitimate basis for excluding MONSIGNOR ALAN PLACA or THEODORE GOODMAN from testifying.**

(If the appeal is from an order, provide a brief description above of the decision in the order.)


**The Order prejudices the Defendant, is improper and a wrongful prejudicial decision of the Court. The Court improperly ruled that granting a continuance of the trial would be not practicable without any lawful basis for such decision. The Court granted much more lengthy discovery schedules to other cases, but this case, against Rudolph W. Giuliani who challenged the 2020 election is being treated differently to cause prejudice to the Defendant. When Defendant requested a continuance to have the trial after the inauguration of President Donald J. Trump as the 47th President of the United \***

456 Arlene Street Staten Island, New York 10314  
Address City State Zip Code

718-477-0020  
Telephone Number

joe@cdlawpc.com  
E-mail Address (if available)

Dated: January 13, 2025

  
Signature

\* Each party filing the appeal must date and sign the Notice of Appeal and provide his or her mailing address and telephone number, EXCEPT that a signer of a pro se notice of appeal may sign for his or her spouse and minor children if they are parties to the case. Fed. R. App. P. 3(c)(2). Attach additional sheets of paper as necessary.

**States, the Court denied that, although the court set a very aggressive schedule from Initial Conference to trial. The Court's prejudicial actions is to deny Defendant a fair trial while there is no prejudice to Plaintiffs.**