

January 16, 2025

**VIA ECF**

Hon. Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Freeman et al. v. Giuliani, No. 24-mc-353 (LJL), No. 24-cv-6563 (LJL)

Dear Judge Liman:

Plaintiffs Ruby Freeman and Wandrea' Moss, Defendant Rudolph W. Giuliani, and Intervenor Andrew Giuliani (collectively, the "Parties") respectfully submit this letter-motion to inform the Court that Plaintiffs and Defendant have executed a settlement agreement ("Agreement") that, once certain conditions are met, would fully resolve all issues currently scheduled for trial, including the claims of Intervenor Andrew H. Giuliani, and would result in the conclusion of all litigation currently pending between and among the Parties.

Accordingly, the Parties respectfully request that the Court adjourn the trial scheduled for January 21, 2025, and the continued contempt hearing currently scheduled for January 29, 2025, to dates on or after February 25, 2025, to permit the Parties to fully implement the Agreement. The Parties will promptly notify the Court upon full satisfaction of the terms of the Agreement.

Plaintiffs have not previously sought any requests for adjournment of the trial date. Defendant has made one such request, No. 24-cv-6563, ECF No. 91, which the Court denied orally during a hearing on November 26, 2024 and memorialized in a subsequent written order, No. 24-cv-6563, ECF No. 104. Other than the appearances described above, no other appearances are currently scheduled.

Respectfully submitted,

s/ Joseph M. Cammarata\*

*Counsel for Defendant*

s/ Aaron E. Nathan

*Counsel for Plaintiffs*

s/ Scott B. McBride\*

*Counsel for Intervenor  
in No. 24-mc-353*

\*Electronic signatures affixed with permission.