

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

THE STATE OF GEORGIA, \*  
vs. \* CASE NUMBER: 23SC188947  
\* Judge: Scott McAfee  
RUDOLPH WILLIAM LOUIS GIULIANI, \*  
Defendant. \*

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DEFENDANT GIULIANI'S MOTION FOR LEAVE TO FILE  
ADDITIONAL MOTIONS

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COMES NOW Defendant Giuliani and files this Motion for Leave to File  
Additional Motions and shows as follows:

1.

This Court previously set a deadline for filing motions of January 8, 2024.

2.

Defendant Giuliani has filed numerous motions, many of which deal with  
discovery.

3.

The State has provided Defendant Giuliani with voluminous discovery which  
Defendant's counsel is still processing.

4.

Defendant Giuliani cannot anticipate what, if any, motions may need to be filed in  
response to the State's response to his initial motions or concerning discovery matters that  
have not yet been reviewed.

5.

Defendant Giuliani requests that the Court exercise its discretion in the allowing  
of any additional motions which Defendant Giuliani might file after the January 8, 2024  
motions filing deadline.

WHEREFORE, Defendant Giuliani prays that this Motion for Leave to File  
Additional Motions be inquired into and sustained provided Defendant Giuliani can

demonstrate good faith in the filing of any motions subsequent to the January 8, 2024 motions filing deadline.

This the 4<sup>th</sup> day of January, 2024.

STOCKTON & STOCKTON, LLC  
191 SOUTH MAIN STREET  
POST OFFICE BOX 1550  
CLAYTON, GEORGIA 30525  
TELEPHONE: (706)782-6100  
[LASTOCKTON@WINDSTREAM.NET](mailto:LASTOCKTON@WINDSTREAM.NET)

/s/ L. Allyn Stockton, Jr.  
L. ALLYN STOCKTON, JR.,  
Attorney for Defendant  
Georgia State Bar # 682909

AIDALA, BERTUNA & KAMINS, P.C.  
546 FIFTH AVENUE, 6<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10036  
TELEPHONE: (212)486-0011  
[ESPOSITO@AIDALALAW.COM](mailto:ESPOSITO@AIDALALAW.COM)

/s/ John S. Esposito  
JOHN S. ESPOSITO,  
(ADMITTED PRO HAC VICE)  
Attorney for Defendant  
New York State Bar # 2010809

AIDALA, BERTUNA & KAMINS, P.C.  
546 FIFTH AVENUE, 6<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10036  
TELEPHONE: (212)486-0011  
[JUDGELEWIS@AIDALALAW.COM](mailto:JUDGELEWIS@AIDALALAW.COM)

/s/ David L. Lewis  
DAVID L. LEWIS  
(ADMITTED PRO HAC VICE)  
New York State Bar # 1685791

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STATE OF GEORGIA

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CASE NUMBER: 23SC188947

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RUDOLPH WILLIAM LOUIS GIULIANI,  
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\*

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CERTIFICATE OF SERVICE

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This is to certify that I have this day electronically filed the foregoing DEFENDANT GIULIANI'S MOTION FOR LEAVE TO FILE ADDITIONAL MOTIONS with the Fulton County Clerk of Court using Odyssey Efile Georgia electronic filing system that will send notification of such filing to all parties of record.

This the 4<sup>th</sup> day of January, 2024.

Respectfully Submitted,

/s/ L. Allyn Stockton, Jr.

L. ALLYN STOCKTON, JR.,

Attorney for Defendant

Georgia State Bar # 682909

STOCKTON & STOCKTON, LLC  
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POST OFFICE BOX 1550  
CLAYTON, GEORGIA 30525  
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