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8 *Attorney for Defendants*
9 Garrett Ziegler and ICU, LLC

10 **UNITED STATES DISTRICT COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

12 ROBERT HUNTER BIDEN)

13 Plaintiff,)

14 v.)

15 GARRETT ZIEGLER, AN)
16 INDIVIDUAL, ICU, LLC, A)
17 WYOMING LIMITED LIABILITY)
18 COMPANY D/B/A MARCO POLO,)
19 AND DOES 1 THROUGH 10,)
20 INCLUSIVE,)

21 Defendants.)
22)
23)
24)
25)
26)
27)
28)

Case No. 2:23-cv-07593-HDV-KS

Honorable Hernan D. Vera
Magistrate Judge Karen L. Stevenson

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT
BY NOT MORE THAN 30 DAYS**

Complaint served: September 13, 2023
Current response date: November 17, 2023
New response date: December 15, 2023

1 Defendants' GARRETT ZIEGLER and ICU, LLC ("Ziegler"), by and
2 through their attorneys, stipulate as follows:

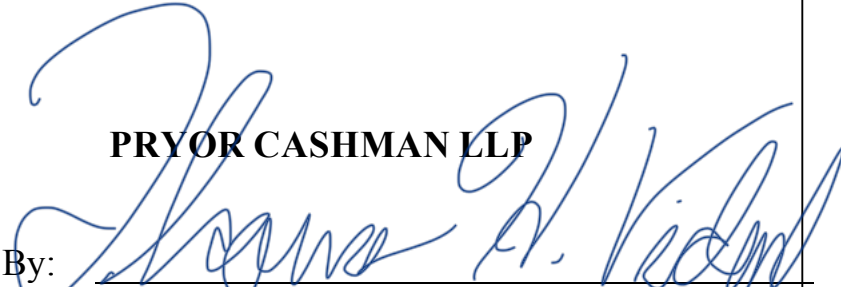
3 WHEREAS, the Complaint in the above-entitled action was served on
4 September 13, 2023;

5
6 WHEREAS, the Answer to the Complaint's current deadline to respond in the
7 above-entitled action is November 17, 2023;

8
9 WHEREAS, Robert Hunter Biden, and Garrett Ziegler and ICU, LLC has
10 agreed, to an extension of time not more than 30 days to answer the Complaint;

11 NOW THEREFORE, THE PARTIES HEREBY STIPULATE THAT:

12
13 Garrett Ziegler and ICU, LLC deadline to answer the Complaint are extended to
14 December 15, 2023.

15
16
17
18 Dated: November 15, 2023 By: 

PRYOR CASHMAN LLP

Thomas H. Vidal
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Attorney for Defendants
Garrett Ziegler and ICU, LLC

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WINSTON & STRAWN LLP

Dated: November 15, 2023 By: /s/ Paul B. Salvaty
Paul B. Salvaty
PSalvaty@winston.com
Attorney for Plaintiff
Robert Hunter Biden

EARLY SULLIVAN WRIGHT GIZER & MCRAE LLP

Dated: November 15, 2023 By: /s/ Bryan M. Sullivan
Bryan M. Sullivan
Zachary C. Hansen
bsullivan@earlysullivan.com
zhansen@earlysullivan.com
Attorneys for Plaintiff
Robert Hunter Biden

CERTIFICATE OF SERVICE

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I certify that on November 15, 2023, I electronically filed a copy of the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of the electronic filing to the following:

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