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Attorneys for Defendants

9 **UNITED STATES DISTRICT COURT**
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
11 **WESTERN DIVISION**

13 ROBERT HUNTER BIDEN, an individual,

14 Plaintiff(s)

15 v.

16 GARRETT ZIEGLER, an individual; ICU,
17 LLC, a Wyoming limited liability company
18 d/b/a Marco Polo, and DOES 1 through 10,
inclusive,

19 Defendant(s)

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

**STIPULATION TO EXTEND TIME
TO RESPOND TO COMPLAINT;
PROPOSED ORDER**

21 **STIPULATION**

22 Plaintiff Robert Hunter Biden and Defendants Garrett Ziegler and ICU, LLC
23 (collectively, “Defendants”) hereby stipulate to the following:
24

25 WHEREAS, on September 13, 2023, Plaintiff Hunter Biden filed his
26 complaint. ECF No. 1;

27 WHEREAS, on November 15, 2023, the parties stipulated to extend the time
28 to respond to the initial complaint by no more than 30 days. ECF No. 16;

1 WHEREAS, the current due date to respond to the initial complaint is
2 December 15, 2023;

3 WHEREAS, on December 07, 2023, Tyler Law, LLP filed a substitution of
4 counsel. ECF No. 17;

5 WHEREAS, Defendants have requested an additional extension of time to
6 respond to the complaint, through and including December 21, 2023, and Plaintiff
7 has agreed to this request;

8 WHEREAS, the parties have fulfilled their meet and confer obligations with
9 respect to Plaintiff's anticipated motion to dismiss the complaint and have agreed
10 that when the motion to dismiss is filed Plaintiff will notice it for hearing on February
11 8, 2024;

12 WHEREAS, good cause exists to extend the deadline for Defendants to
13 respond to the complaint to allow Defendants' counsel additional time to become
14 acquainted with the case;

15 IT IS HEREBY STIPULATED by and between the parties, that Defendants shall
16 respond to the complaint by December 21, 2023.

17 Dated: December 12, 2023

TYLER LAW, LLP

18
19 /s/ Mariah Gondeiro
20 Mariah Gondeiro
21 *Attorneys for Defendants*

22 Dated: December 12, 2023

WINSTON & STRAWN

23
24 /s/ Paul Salvaty
25 *Attorneys for Plaintiff*
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27
28

Proposed Order

The Court, having considered the stipulation submitted herewith, hereby enters the following order:

Defendants' shall respond to the complaint by December 21, 2023.

IT IS SO ORDERED.

Dated: _____

Honorable Herman D. Vera

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