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ROBERT HUNTER BIDEN

11 (*Additional Counsel on following page*)  
12

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 ROBERT HUNTER BIDEN, an  
16 individual,

17 Plaintiff,

18 vs.

19 RUDOLPH W. GIULIANI, an  
20 individual, GIULIANI PARTNERS,  
LLC, a Limited Liability Company,  
21 GIULIANI GROUP, LLC, a Limited  
Liability Company; GIULIANI  
22 SECURITY & SAFETY, LLC, a Limited  
Liability Company, ROBERT J.  
23 COSTELLO, an individual, and DOES 1  
24 through 10, inclusive;

25 Defendants.  
26  
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**Case No. 2:23-cv-08032-HDV-KSx**

**STIPULATION TO EXTEND TIME  
TO RESPOND TO INITIAL  
COMPLAINT BY NOT MORE  
THAN 30 DAYS (L.R. 8-3)**

Hon. Hernan D. Vera

Complaint Served: Oct. 2, 2023

Current Response Date: Dec. 4, 2023

New Response Date: Jan. 3, 2024

1 *Additional Counsel for Plaintiff*  
2 *Robert Hunter Biden:*

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1 Plaintiff ROBERT HUNTER BIDEN, by and through his attorneys, and  
2 Defendants RUDOLPH W. GIULIANI, GIULIANI PARTNERS, LLC, GIULIANI  
3 GROUP, LLC, GIULIANI SECURITY & SAFETY, LLC and ROBERT J.  
4 COSTELLO, by and through their attorneys, stipulate as follows:

5  
6 **STIPULATION**

7 WHEREAS, Defendants accepted service of the Initial Complaint on October 2,  
8 2023.

9 WHEREAS, the Response date to the Initial Complaint is currently December  
10 4, 2023.

11 WHEREAS, Plaintiff and Defendants have agreed to an extension of time of no  
12 more than 30 days to respond to the Initial Complaint.

13 NOW, THEREFORE, the Parties stipulate that the new due date to respond to  
14 the initial complaint is January 3, 2024.

15 IT IS SO STIPULATED.

16  
17  
18 Dated: December 1, 2023

CAMARA & SIBLEY LLP


19 By: Joe Sibley  
20 Joseph D. Sibley  
21 Attorneys for Defendants

22 WINSTON & STRAWN LLP

23 By: Paul B. Salvaty  
24 Paul B. Salvaty  
25 Abbe David Lowell  
26 Attorneys for Plaintiff  
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EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

By: 


Bryan M. Sullivan  
Zachary C. Hansen  
Attorneys for Plaintiff

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**FILER'S ATTESTATION**

I, Paul B. Salvaty, attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: December 1, 2023



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Paul B. Salvaty