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ROBERT HUNTER BIDEN

10 *(Additional Counsel on following page)*

11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 ROBERT HUNTER BIDEN, an
15 individual,

16 Plaintiff,

17 vs.

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

24 Defendants.
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Case No. 2:23-cv-08032-HDV-KSx

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

Hon. Hernan D. Vera

Complaint Served: Oct. 2, 2023

Current Response Date: Jan. 3, 2024

New Response Date: Jan. 17, 2024

1 *Additional Counsel for*
2 *Defendants:*

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

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6 **STIPULATION**

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

9 WHEREAS, on December 1, 2023, the parties stipulated to extend the time to
10 respond to the initial complaint by no more than 30 days. (ECF No. 19);

11 WHEREAS, the response date to the initial complaint is currently January 3,
12 2024;

13 WHEREAS, one of the defendants, Rudolph W. Giuliani (“Giuliani”), filed for
14 Chapter 11 bankruptcy on December 21, 2023 in the United States Bankruptcy Court
15 for the Southern District of New York Case No. 23-12055 (SHL), which filing has
16 automatically stayed this action as to Giuliani;

17 WHEREAS, based on these circumstances, counsel for Defendants has
18 requested an additional extension of time for Defendants Giuliani Partners, LLC,
19 Giuliani Group, LLC, Giuliani Security & Safety, LLC and Robert J. Costello to
20 prepare and file their responsive pleading(s), and, subject to Court approval, Plaintiff
21 has agreed to a further extension of their response deadline by two weeks;

22 NOW, THEREFORE, the Parties stipulate that the new due date for Defendants
23 Giuliani Partners, LLC, Giuliani Group, LLC, Giuliani Security & Safety, LLC and
24 Robert J. Costello to respond to the initial complaint is January 17, 2024.

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26 IT IS SO STIPULATED.
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Dated: December 28, 2023

GORDEE, NOWICKI &
BLAKENEY LLP

By: /s/ Alan J. Gordee
Alan J. Gordee
Attorneys for Defendants

WINSTON & STRAWN LLP

By: /s/ Paul B. Salvaty
Paul B. Salvaty
Abbe David Lowell
Attorneys for Plaintiff

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

By: /s/ Bryan M. Sullivan
Bryan M. Sullivan
Zachary C. Hansen
Attorneys for Plaintiff

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 28, 2023

/s/ Paul B. Salvaty _____
Paul B. Salvaty

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