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17 GIULIANI GROUP, LLC; GIULIANI  
18 SECURITY & SAFETY, LLC; and ROBERT  
19 J. COSTELLO

20 **UNITED STATES DISTRICT COURT**  
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 ROBERT HUNTER BIDEN, an individual,  
23  
24 Plaintiff,

25 v.

26 RUDOLPH W. GIULIANI, an individual,  
27 GIULIANI PARTNERS, LLC, a Limited  
28 Liability Company; GIULIANI GROUP,  
LLC, a Limited Liability Company;  
GIULIANI SECURITY & SAFETY, LLC, a  
Limited Liability Company, ROBERT J.  
COSTELLO, an individual, and Does 1  
through 20, inclusive;  
Defendants.

Case No.: 2:23-cv-08032-HDV-KSx  
Hon. Hernan D. Vera

**DECLARATION OF RUDOLPH W.  
GIULIANI IN SUPPORT OF  
DEFENDANTS' NOTICE OF MOTION  
AND MOTION TO DISMISS  
PURSUANT TO RULES 12(b)(2) AND  
12(b)(6) OF THE FEDERAL RULES OF  
CIVIL PROCEDURE AND CAL. CODE  
CIV. PROC. § 425.16; MEMORANDUM  
OF POINTS AND AUTHORITIES**

Hearing Date: March 21, 2024  
Hearing Time: 10:00 a.m.  
Courtroom: 5B

**DECLARATION OF RUDOLPH W. GIULIANI**

I, RUDOLPH W. GIULIANI, declare as follows:

I have personal knowledge of the following facts and, if called and sworn as a witness, I could and would testify competently to them.

1. I am a Defendant in this action. I am also the sole managing member of GIULIANI PARTNERS, LLC, a Delaware limited liability company headquartered in New York, GIULIANI GROUP, LLC, a Delaware limited liability company headquartered in New York, and GIULIANI SECURITY & SAFETY, LLC, a Delaware limited liability company headquartered in New York, who are also Defendants in this matter.

2. I have hired no employees or independent contractors to conduct any business on behalf of myself or any other Defendant in this case in the State of California. This is also true of GIULIANI PARTNERS, LLC, GIULIANI GROUP, LLC, and GIULIANI SECURITY & SAFETY, LLC. Those entities do not have any employees or independent contractors who reside or operate in the State of California.

3. I do not hold any professional licenses from the State of California, I do not have an office in the State of California, and I do not have a registered agent for service of process in California. This is also true of GIULIANI PARTNERS, LLC, GIULIANI GROUP, LLC, and GIULIANI SECURITY & SAFETY, LLC.

4. I do not own any property in the State of California and I have no assets located in the State of California. This is also true of GIULIANI PARTNERS, LLC, GIULIANI GROUP, LLC, and GIULIANI SECURITY & SAFETY, LLC.

5. I have never travelled to the State of California in any way relating to or concerning Hunter Biden, the Biden Laptop, or in any other way relating to or concerning the allegations made by the Plaintiff in the Complaint. This is also true of GIULIANI

1 PARTNERS, LLC, GIULIANI GROUP, LLC, and GIULIANI SECURITY & SAFETY,  
2 LLC.

3  
4 6. I did not know Hunter Biden was a citizen of the State of California until this  
5 lawsuit was filed.

6 7. All of my statements I have made concerning Hunter Biden, the Biden Laptop,  
7 or any other way relating to or concerning the allegations in the Complaint occurred in the  
8 State of New York.

9 I declare under penalty of perjury under the laws of the United States of America that  
10 the foregoing is true and correct and that this declaration is executed on January 17, 2024 in  
11 New York, New York.

12  
13  
14 *Rudolph Giuliani*  
15 \_\_\_\_\_  
16 RUDOLPH W. GIULIANI