

1 PAUL B. SALVATY (State Bar No. 171507)  
PSalvaty@winston.com  
2 WINSTON & STRAWN LLP  
333 S. Grand Ave., 38th Fl.  
3 Los Angeles, CA 90071-1543  
Telephone: (213) 615-1700  
4 Facsimile: (213) 615-1750

5 ABBE DAVID LOWELL (*pro hac vice* forthcoming)  
AbbeLowellPublicOutreach@winston.com  
6 WINSTON & STRAWN LLP  
1901 L St., N.W.  
7 Washington, DC 20036-3508  
Telephone: (202) 282-5000  
8 Facsimile: (202) 282-5100

9 BRYAN M. SULLIVAN (State Bar No. 209743)  
bsullivan@earlysullivan.com  
10 ZACHARY C. HANSEN (State Bar No. 325128)  
zhansen@earlysullivan.com  
11 EARLY SULLIVAN WRIGHT GIZER & McRAE LLP  
6420 Wilshire Boulevard, 17th Fl.  
12 Los Angeles, California 90048  
Telephone: (323) 301-4660  
13 Facsimile: (323) 301-4676

14 Attorneys for PLAINTIFF  
ROBERT HUNTER BIDEN  
15

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 ROBERT HUNTER BIDEN, an  
19 individual,

20 Plaintiff,

21 vs.

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

28 Defendants.

**Case No. 2:23-cv-8032**

**NOTICE OF RELATED CASE (L.R.  
83-1.3.1)**

(To be related to Case No.  
2:23-CV-07593 HDV (KSx))

1 Pursuant to Local Rule 83-1.3.1, Plaintiff Robert Hunter Biden (“Plaintiff”)   
2 hereby identifies *Robert Hunter Biden v. Garrett Ziegler, et al.*, Case No.   
3 2:23–CV–07593 HDV (KSx), filed September 13, 2023 (C.D. Cal.) (“the *Ziegler*   
4 action”) as related to the instant case.

5 The *Ziegler* action and the instant action are related under Local Rule 83-1.3.1(a)   
6 because they “arise from the same or a closely related transaction, happening or event.”   
7 In both actions, Plaintiff seeks redress for the Defendants having hacked into, tampered   
8 with, manipulated, altered, copied and damaged data that they were given that was   
9 taken or stolen from Plaintiff’s devices or storage platforms, including what Defendants   
10 claim to have obtained from Plaintiff’s alleged “laptop” computer. In both actions,   
11 Plaintiff alleges that, although the precise manner by which the Defendants obtained   
12 Plaintiff’s data remains unclear, Defendants have, to at least some extent, accessed,   
13 tampered with, manipulated, altered, copied and damaged Plaintiff’s data, and their   
14 actions are illegal, unauthorized and without Plaintiff’s consent. In both actions, data   
15 that Defendants purport had belonged to Plaintiff appears to have been tampered with,   
16 manipulated and altered both before and after Defendants received it and after   
17 Defendants began illegally tampering with it themselves. Moreover, Defendant Ziegler   
18 might have obtained some of the data that is alleged to have come from the purported   
19 “laptop” from an associate of Defendants Giuliani and Costello; and one or more of the   
20 Defendants in both cases might have obtained some of the data alleged to have come   
21 from the purported “laptop” either directly or indirectly from the same individual, John   
22 Paul Mac Isaac.

23 The *Ziegler* action and the instant action also are related under Local Rule 83-   
24 1.3.1(b) because they “call for determination of the same or substantially related or   
25 similar questions of law and fact.” Plaintiff asserts the same three causes of action   
26 against Defendants in each case, including claims for Violation of the Computer Fraud   
27 and Abuse Act (18 U.S.C. § 1801), Violation of the California Computer Data Access   
28 and Fraud Act (Cal. Penal Code § 502), and violation of California’s Unfair

1 Competition Law (Cal. Bus. & Prof Code §§ 17200, *et seq.*). Plaintiff seeks identical  
2 forms of relief in the *Ziegler* action and the instant action. Furthermore, to at least some  
3 extent, both actions are likely to require documents, deposition testimony and trial  
4 testimony from some of the same witnesses who have knowledge concerning the  
5 computer-hacking activities at issue in the case.


6 The *Ziegler* action and the instant action also are related under Local Rule 83-  
7 1.3.1(c) because “for other reasons [the two actions] would entail substantial  
8 duplication of labor if heard by different judges.” Both actions arise from interrelated  
9 facts and present identical theories of recovery. Plaintiff submits that the interests of  
10 judicial economy and efficiency would be served, and duplication of labor would be  
11 avoided, if the same District Judge and Magistrate Judge were to hear the case because  
12 similar issues are likely to arise in any motion practice concerning the pleadings, in any  
13 disputes concerning the scope and nature of discovery, and with respect to the  
14 preparation for and conduct of trial.

15 In light of the foregoing, Plaintiff respectfully submits that the *Ziegler* action and  
16 the instant action are related cases under Local Rule 83-1.3.1.

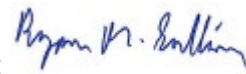
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18 Respectfully submitted,

19 Dated: September 26, 2023

20 WINSTON & STRAWN LLP

21 By:   
22 Paul Salvaty  
23 Abbe David Lowell  
24 Attorneys for Plaintiff

25 EARLY SULLIVAN WRIGHT  
26 GIZER & McRAE LLP

27 By:   
28 Bryan M. Sullivan

Zachary C. Hansen  
Attorneys for Plaintiff

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