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Attorneys for Plaintiff  
14 ROBERT HUNTER BIDEN

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

18 ROBERT HUNTER BIDEN,

19 Plaintiff,

20 v.

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

26 Defendants.  
27  
28

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

**JOINT STIPULATION TO TAKE OFF  
CALENDAR DEFENDANTS' MOTION  
TO DISMISS PURSUANT TO RULES  
12(b)(2) AND 12(b)(6) OF THE  
FEDERAL RULES OF CIVIL  
PROCEDURE AND CAL CIV. PROC.  
CODE SECTION 425.16**

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

**STIPULATION**

1  
2 Plaintiff ROBERT HUNTER BIDEN and Defendants GIULIANI PARTNERS,  
3 LLC, GIULIANI GROUP, LLC, GIULIANI SECURITY & SAFETY, LLC, and  
4 ROBERT J. COSTELLO,<sup>1</sup> by and through their respective counsel, jointly request the  
5 Court to take Defendants’ Motion to Dismiss Pursuant to Rules 12(b)(2) and 12(b)(6)  
6 of the Federal Rules of Civil Procedure and Cal. Civ. Proc. Code Section 425.16 (the  
7 “Motion”) off calendar.

8 WHEREAS, on February 28, 2024, counsel for the parties meaningfully met and  
9 conferred regarding the Motion;

10 WHEREAS, the parties agreed that the Motion should be taken off calendar; and

11 WHEREAS, the parties agreed that they will negotiate and submit within the next  
12 ten (10) days a further stipulation and proposed order regarding further proceedings in  
13 this action including, but not limited to, the transfer of this case to the United States  
14 District Court for the Southern District of New York;

15 NOW, THEREFORE, the parties hereby stipulate and agree that the Motion shall  
16 be taken off the Court’s hearing calendar.

17  
18 **SO STIPULATED AND AGREED.**

19  
20 Dated: February 29, 2024

Respectfully submitted,

21 WINSTON & STRAWN LLP

22  
23 By: /s/ Paul B. Salvaty  
Paul B. Salvaty

24 *Attorneys for Plaintiff*  
25 ROBERT HUNTER BIDEN

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27 \_\_\_\_\_  
28 <sup>1</sup> Plaintiff also sued Rudolph W. Giuliani (“Giuliani”). The action against Giuliani is presently stayed due to his  
bankruptcy petition pending in the Southern District of New York. As a result, Giuliani is not participating in the  
Motion.

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Dated: February 29, 2024

Respectfully submitted,

GORDEE, NOWICKI & BLAKENEY LLP

By: /s/ Alan J. Gordee  
Alan J. Gordee

*Attorneys for Defendants*  
GIULIANI PARTNERS, LLC; GIULIANI  
GROUP, LLC; GIULIANI SECURITY &  
SAFETY, LLC; and ROBERT J.  
COSTELLO

**ATTESTATION**

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

/s/ Paul B. Salvaty  
Paul B. Salvaty

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