

1 ABBE DAVID LOWELL
AbbeLowellPublicOutreach@winston.com

2 WINSTON & STRAWN LLP
1901 L St., N.W.
3 Washington, D.C. 20036-3508
Telephone: (202) 282-5000
4 Facsimile: (202) 282-5100

5 BRYAN M. SULLIVAN, State Bar Number 209743
bsullivan@earlysullivan.com

6 ZACHARY C. HANSEN, State Bar Number 325128
zhansen@earlysullivan.com

7 EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP
8 6420 Wilshire Boulevard, 17th Floor
Los Angeles, California 90048
9 Telephone: (323) 301-4660
Facsimile: (323) 301-4676

10 Attorneys for Plaintiff
11 Robert Hunter Biden

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA
14 WESTERN DIVISION

15 ROBERT HUNTER BIDEN, an
16 individual,

17 Plaintiff,

18 vs.

19 GARRETT ZIEGLER, an individual,
20 ICU, LLC, a Wyoming Limited
Liability Company d/b/a Marco Polo,
21 and DOES 1 through 10, inclusive,

22 Defendants.

Case No. 2:23-cv-07593-HDV-KS

*Assigned to:
District Judge Hernán D. Vera*

**DECLARATION OF ROBERT
HUNTER BIDEN IN SUPPORT OF
PLAINTIFF ROBERT HUNTER
BIDEN'S EX PARTE
APPLICATION FOR AN ORDER
MOTION AND MOTION TO
VOLUNTARILY DISMISS ACTION
PURSUANT TO FED. RULE CIV.
PROC. 41(a)(2)**

*[Notice of Ex Parte Application and Ex
Parte Application; Declaration of
Bryan M. Sullivan; and [Proposed]
Order filed and served concurrently
herewith]*

Place: Ctrm. 5B

Judge: Hon. Honorable Hernan D. Vera

DECLARATION OF ROBERT HUNTER BIDEN

I, Robert Hunter Biden, declare and state as follows:

1. I am over the age of 18 and am the Plaintiff in this Action. I submit this declaration in support of Plaintiff Robert Hunter Biden's Notice Of Motion And Motion To Voluntarily Dismiss Action Pursuant To Fed. Rule Civ. Proc. 41(A)(2). If called as a witness, I would and could testify to the matters contained herein.

2. While I believe in the merits of this case, and, indeed, note that Defendant Garrett Ziegler admitted to hacking my iCloud in multiple public statements, I am requesting to dismiss this action because I do not have the financial resources to continue litigating this case. Indeed, Defendants admitted in public statements in December 2022 in an interview with Roger Stone, which I have seen, as follows:

And we actually got into his iPhone backup, we were the first group to do it in June of 2022, we cracked the encrypted code that was stored on his laptop. And more drug deals were in there, which set our, set our release date back.

3. Since late 2023 and through today, my income has decreased significantly. Prior to that time, my income primarily came from sales of my artwork and sales of my memoir entitled "*Beautiful Things*". In the 2 to 3 years prior to December 2023, I sold 27 pieces for art at an average price of \$54,481.48, but since then I have only sold 1 piece of art for \$36,000. Similarly, for my book sales, in the six month period before the statements (April 1, 2023 through September 30, 2023), based on the September 30, 2023 statement, 3,161 copies of my book were sold, but in the six months after the statements, only approximately 1,100 books were sold. Given the positive feedback and reviews of my artwork and memoir, I was expecting to obtain paid speaking engagements and paid appearances, but that has not happened.

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1 4. This significant decrease in revenue has also impacted my ability to pay
2 off my significant debt, which as has been reported in the press as being several
3 million dollars. As a result of this, I am not in a position where I can borrow money.

4 5. In addition to this significant decrease in income and my debt, my lack
5 of financial resources has been exacerbated by the fires in the Pacific Palisades in
6 early January, which has rendered my rental house unlivable for an extended period
7 of time and, like many others in that situation, I am having difficulty in finding a new
8 permanent place to live.

9 6. While I was aware that my financial position had significantly
10 deteriorated over time, it was not until the past month that I realized I had to take
11 drastic actions to alleviate this situation. Then, during the week of February 24, 2025,
12 I was informed of all the work that was going to be performed over the next two
13 months and the estimated amount of fees and costs and over the weekend of March
14 1-2, 2025, I decided to voluntarily dismiss this action.

15 7. While I have other civil actions pending, I am assessing each one on a
16 case-by-case basis to allocate my limited resources. I cannot describe the details of
17 those analyses as it involves attorney-client communications and the attorney work
18 doctrine, but significant changes will be made to all of the cases in which I am
19 involved. For this case, despite Defendants' public admissions that they "hacked" my
20 iCloud and manipulated my data, given the procedural posture of the case, the limited
21 extent of discovery taken, and the need for expert testimony, I have made the decision
22 to request that this case be voluntarily dismissed without prejudice and not expend
23 any further resources and time on this case.

24 8. Ultimately, this dismissal is necessary so I can focus my time and
25 resources dealing with my relocation, the damage I and my family have incurred due

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1 to the Pacific Palisades fires, and paying for my family's living expenses as opposed
2 to this litigation.

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4 I declare under penalty of perjury under the laws of the State of California that
5 the foregoing is true and correct. Executed on this 4th day of March, 2025, at Los
6 Angeles County, California.

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Robert Hunter Biden

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CERTIFICATE OF SERVICE

I, April Wright, hereby certify that on this 5th day of March, 2025, a copy of the foregoing **DECLARATION OF ROBERT HUNTER BIDEN IN SUPPORT OF PLAINTIFF ROBERT HUNTER BIDEN'S EX PARTE APPLICATION FOR AN ORDER MOTION AND MOTION TO VOLUNTARILY DISMISS ACTION PURSUANT TO FED. RULE CIV. PROC. 41(a)(2)** was served via email, on the following:

Jennifer Linsley Holliday
LAW OFFICE OF
JENNIFER LINSLEY HOLLIDAY,
ESQ.
7190 W. Sunset Boulevard, #1430
Los Angeles, CA 90046
Tel: (805) 622-0225
Email: jlholliday@proton.me

*Attorney for Defendants
Garrett Ziegler and ICU. LLC*

Robert H. Tyler
ADVOCATES FOR
FAITH & FREEDOM
25026 Las Brisas Road
Murrieta, CA 92562
Tel: (951) 600-2733
Email: btyler@faith-freedom.com

*Attorney for Defendants
Garrett Ziegler and ICU, LLC*

/s/ April Wright
APRIL WRIGHT
An employee of EARLY SULLIVAN
WRIGHT GIZER & MCRAE LLP