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Attorneys for Defendants **Garrett Ziegler** and **ICU, LLC**

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

ROBERT HUNTER BIDEN, an individual,  
Plaintiff,

vs.

GARRETT ZIEGLER, an individual; ICU, LLC, a  
Wyoming limited liability company d/b/a Marco  
Polo, and DOES 1 through 10, inclusive,  
Defendant(s)

Case No.: 23-cv-07593-HVD-KS

**ROBERT H. TYLER’S DECLARATION IN  
SUPPORT OF DEFENDANTS’  
OPPOSITION TO MOTION TO DISMISS**

I, Robert H. Tyler, declare as follows:

1. I am an attorney of record in this matter for defendants GARRETT ZIEGLER, an individual (“Defendant Ziegler”) and defendant ICU, LLC, a Wyoming limited liability company

1 d/b/a Marco Polo (“Defendant ICU”). Defendant Ziegler and Defendant ICU are referred to  
2 hereinafter as “Defendants” unless otherwise specified.

3 2. I make this declaration in support of Defendants’ Opposition to Plaintiff’s Ex Parte  
4 Motion Re: Voluntary Dismissal.

5 3. I am a partner in Tyler Law, LLP and have been actively involved in providing  
6 legal representation in this case since its inception. On or about December 3, 2023, Tyler Law  
7 LLP, was retained by Defendants to defend against the complaint filed by plaintiff, ROBERT  
8 HUNTER BIDEN, an individual (“Plaintiff”), Case No.: 23-cv-07593-HVD-KS.

9 4. Since being retained, Defendants have incurred substantial costs and attorney’s fees  
10 related to defending this case. From December 3, 2023, until March 6, 2025, Tyler Law, LLP have  
11 performed 648.2 hours of billable hours and Defendants have incurred \$196,565.20 in attorney’s  
12 fees defending this case. Further, Defendants have incurred \$1,070.20 in costs and expenses related  
13 to defending this case.

14 I declare under penalty of perjury under the laws of the United State of America that the  
15 foregoing is true and correct. Executed on March 6, 2025, at Murrieta, California.

16  
17  
18 /s/ Robert H. Tyler  
19 Robert H. Tyler