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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,  
ICU, LLC, a Wyoming Limited  
20 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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I declare under penalty of perjury under the laws of the State of California that  
the foregoing is true and correct. Executed on this 4<sup>th</sup> day of March, 2025, at Los  
Angeles County, California.



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:

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*/s/ April Wright*  
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