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Ziegler and **ICU, LLC**
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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 ROBERT HUNTER BIDEN, an individual,
13

14 Plaintiff,

15 vs.

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

18 Defendant(s)
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Case No.: 23-cv-07593-HDV-KS

Honorable Hernan D. Vera
Magistrate Judge Karen L. Stevenson

**NATHAN R. KLEIN’S DECLARATION IN
SUPPORT OF DEFENDANTS’ MOTION
FOR RECUSAL**

21 I, Nathan R. Klein, declare as follows:

22 1. I am an attorney for Defendants GARRETT ZIEGLER, an individual and ICU, LLC, a
23 Wyoming limited liability company d/b/a Marco Polo (“Defendants”), in the above-entitled action.
24 Unless otherwise noted as being on information and belief, I know the facts herein are stated based upon
25 my own personal knowledge, and if called upon to do so, I could competently testify to them under oath.
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1 2. On Friday, February 16, 2024, I sent a letter via email to counsel for the Plaintiff
2 informing them that Defendants intended to file a motion for recusal. My email included the rules and
3 law Defendants intended to rely on and the specific facts that supported Defendants' arguments.

4 3. On Tuesday, February 20, 2024, I spoke with attorney Paul Salvaty, one of Plaintiff's
5 attorneys on the telephone to discuss Defendants' motion to recuse/disqualify the Honorable Judge Vera
6 pursuant to 28 U.S.C. § 455(a).

7 4. We did not reach an agreement on the issues, although both he and I recognized this
8 motion is directed at the Court and therefore even our agreement could not affect any change in the
9 proceedings as the decision to recuse lies with the Court.

10 I declare under penalty of perjury under the laws of the United States of America that the
11 foregoing is true and correct. Executed on 03/07, 2024, at Murrieta, California.

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13 /s/ Nathan R. Klein
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15 Nathan R. Klein
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