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8	UNITED STATES DISTRICT COURT	
9	FOR THE CENTRAL DISTRICT OF CALIFORNIA	
10	UNITED STATES OF AMERICA,	No. CR 23-599-MCS
11	,	
12	Plaintiff,	APPLICATION FOR ORDER COMPELLING TESTIMONY OF
13	V.	HALLIE BIDEN PURSUANT TO TITLE 18 U.S.C § 6001 ET SEO.;
14	ROBERT HUNTER BIDEN,	MEMORANDUM OF POINTS AND
15	Defendant.	<u>AUTHORITIES; DECLARATION OF</u> DAVID C. WEISS; EXHIBIT;
16		[PROPOSED] ORDER
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18	The Special Counsel hereby applies to this Honorable Court for an order	
19	compelling Hallie Biden to testify and produce evidence pursuant to the provisions of	
	Title 18, United States Code, Section 6001 et seq., and respectfully represents as follows:	
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Hallie Biden has been subpoenaed to testify before this Court during trial 1. beginning on June 20, 2024;

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- Counsel for Hallie Biden has advised that if Hallie Biden is called to the 2. stand she will at that time refuse to answer questions, invoking the constitutional privilege against self-incrimination;
- 3. In the judgment of the Special Counsel, the testimony of Hallie Biden may be necessary to the public interest; and

Acting Deputy Assistant Attorney General Stuart M. Goldberg, an 1 4. authorized Deputy Assistant Attorney General of the United States, has approved this 2 3 application for an order instructing Hallie Biden to testify pursuant to 18 U.S.C. § 6002 and 28 C.F.R. § 0.175(a). 4 Wherefore, pursuant to the provisions of 18 U.S.C. § 6001 et seq., the Special 5 Counsel requests that the Court order Hallie Biden to give testimony relating to all 6 matters within her knowledge about which she may be interrogated in this matter. 7 In support of this motion, the Special Counsel submits herewith the attached 8 declaration of DAVID C. WEISS, exhibit, and proposed order. 9 Dated: May 20, 2024 Respectfully submitted, 10 11 DAVID C. WEISS Special Counsel 12 13 14 $/_{\rm S}/$ 15 Leo J. Wise 16 Principal Senior Assistant Special Counsel Derek E. Hines 17 Senior Assistant Special Counsel 18 Attorneys for Plaintiff 19 UNITED STATES OF AMERICA 20 21 22 23 24 25 26 27 28

MEMORANDUM OF POINTS AND AUTHORITIES

The United States is applying to this court pursuant to 18 U.S.C. § 6003 for an order compelling the testimony of a witness before the Court in this matter. Section 6003(b) provides that the Special Counsel may request such an order when in his judgment the testimony or other information from an individual may be necessary to the public interest, and such individual has refused or is likely to refuse to testify or provide other information on the basis of his privilege against self-incrimination. The attached Declaration of DAVID C. WEISS, Special Counsel, establishes that in his judgment the testimony of this witness may be necessary to the public interest and that this witness has refused or will refuse to testify on the basis of her privilege against self-incrimination. Section 6003(a) provides that "the United States district court . . . shall issue . . . an order requiring such individual to give testimony or provide other information which he refuses to give or provide on the basis of his privilege against self-incrimination." The grant of the order is, therefore, mandatory upon a proper request such as the one presented here.