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15  
16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 UNITED STATES

19 Plaintiff,

20 vs.

21 ROBERT HUNTER BIDEN,

22 Defendant.  
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**Case No. 2:23-cr-00599-MCS**

*Hon. Mark C. Scarsi*

**SUPPLEMENTAL GLOSSARY OF  
TERMS**

1 Pursuant to the Court’s standing order, on August 29, 2024, the parties met and  
2 conferred by email regarding a glossary of terms for the court reporter. Counsel for  
3 Defendant Robert Hunter Biden, provided a list of twenty-two names to include on the  
4 list (D.E. 212). In response, Special Counsel expressed he was “concerned that  
5 adding some of them indicates that the defense intends to violate the Court’s rulings  
6 on the motions in limine,” highlighted the names he believed fell in that category, and  
7 requested an explanation of how those names will come up at trial. *See* Exhibit A,  
8 Meet & Confer Email, Aug. 29, 2024. Counsel for Defendant replied explaining that  
9 the court reporter will be transcribing matters both in front of and outside the presence  
10 of the jury, therefore the names could very likely come up in proceedings outside the  
11 presence of the jury, without any intention on the part of defense counsel to violate  
12 any court orders. *Id.* Special Counsel proceeded to file the glossary without including  
13 the names, but did state in the government’s filing that the government believed  
14 defense counsel intended to violate the Court’s rulings on the motions in limine. (D.E.  
15 212 at Pg. 1). Special counsel did not include in the filing defense counsel’s position  
16 that the terms could be used in matters that may be raised outside the presence of the  
17 jury. Special counsel used an otherwise uneventful trial document as an opportunity  
18 to cast defense counsel in a negative light and prejudice the defendant before this  
19 Court by implying that the defense would intentionally violate this Court’s orders.  
20 Defense counsel has no intention of violating the Court’s Order by the inclusion of  
21 these names.  
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Accordingly, counsel for defendant provides the following supplemental list which were excluded from the government’s filing and attaches the written meet and confer communications between counsel regarding the glossary.

Dated: August 30, 2024

Respectfully submitted,

/s/ Mark Geragos

Mark J. Geragos  
Tina Glandian  
Setara Qassim

Angela M. Machala  
Abbe David Lowell  
*Attorneys for Robert Hunter Biden*

**Supplemental Glossary of Terms**

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Alexander Smirnov  
Chris Clark  
Christopher Walter (FBI Special Agent)  
David Weiss (Special Counsel)  
Joshua Lee (MD, MSC)  
Konstantin Kulyk  
Lesley Wolf  
Lev Parnas  
Merrick Garland (U.S. Attorney General)  
Rudy Giuliani