

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA)	
)	
v.)	Criminal Action No. 1:23-cr-00061-MN
)	
ROBERT HUNTER BIDEN,)	
)	
Defendant.)	
)	

STATUS REPORT

Defendant Robert Hunter Biden files this Status Report to bring to the Court’s attention the status of the case filed against him in Delaware and to address issues pending in this matter:

1. On April 11, 2024, the Court issued an Oral Order that the parties resubmit a proposed scheduling order using the Court’s form by April 18, 2024 (DE 96).

2. Following that Order, the Court ruled on three of Mr. Biden’s four pending motions to dismiss and other pending discovery-related motions. (DE 97 – 101).

3. Today, we filed a Notice of Appeal of some of the Court’s rulings (those for which Third Circuit law provides such interlocutory review). In addition, we have conferred with the Special Counsel’s Office to discuss the pretrial schedule in light of both the Notice—certain proposed dates for which there would have been inadequate time to meet, even without the Notice of Appeal being filed—and also that the government’s proposed pretrial schedule included more items than the Court’s template order provided for. (DE 96).

4. Accordingly, in light of the April 18 deadline, Mr. Biden believes the parties would benefit from, and respectfully requests, a brief status conference with the Court to seek further clarity regarding a scheduling order in this matter. We reached out to the Special Counsel’s Office

yesterday to seek their response to this request. They just responded that they would not agree to a status and then filed their version of the scheduling order without us. Mr. Biden's counsel is available at the Court's convenience.

Dated: April 17, 2024

Respectfully submitted,

Bartholomew J. Dalton (#808)
DALTON & ASSOCIATES, P.A.
1106 West 10th Street
Wilmington, DE 19806
Tel.: (302) 652-2050
BDalton@dalton.law

/s/ Abbe David Lowell
Abbe David Lowell
Christopher D. Man
WINSTON & STRAWN LLP
1901 L Street NW
Washington, DC 20036
Tel.: (202) 282-5000
Fax: (202) 282-5100
AbbeLowellPublicOutreach@winston.com
CMan@winston.com

Counsel for Robert Hunter Biden

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of April, 2024, I filed the foregoing Status Report with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Abbe David Lowell
Abbe David Lowell

Counsel for Robert Hunter Biden