

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

UNITED STATES OF AMERICA)	
)	
v.)	Criminal Action No. 1:23-cr-61-MN
)	
ROBERT HUNTER BIDEN,)	
)	
Defendant.)	

MOTION AND ORDER TO SEAL FILING

The United States of America, by and through its attorneys, David. C. Weiss, Special Counsel, and Derek E. Hines and Leo J. Wise, Assistant United States Attorneys for the District of Delaware, move that the enclosed filing be filed under seal as well as the accompanying proposed order and requested order from the court. The filing relates to a witness issue in the upcoming trial. The government will move to unseal this filing after the conclusion of the witness’s testimony at trial. In the interim, the government requests that the filings remain under seal to protect her identity from public disclosure so that her security is not compromised and so that there will be no witness intimidation issues that could undermine these proceedings. *See United States v. Smith*, 776 F.2d 1104, 1115 (3d Cir. 1985).

Respectfully submitted,

DAVID C. WEISS
Special Counsel

BY: /s/ Derek E. Hines
Derek E. Hines
Senior Assistant Special Counsel
Leo J. Wise
Principal Senior Assistant Spec. Counsel

United States Department of Justice

Dated: May 17, 2024

AND NOW, to wit, this _____ day of _____, 2024, upon the foregoing Motion, **IT IS HEREBY ORDERED** that the filings accompanying the motion are to be sealed in their entirety.

HONORABLE MARYELLEN NOREIKA
UNITED STATES DISTRICT JUDGE