

**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.	)	
	)	
_____	)	

**MR. BIDEN’S REPLY IN SUPPORT OF HIS MOTION *IN LIMINE* TO EXCLUDE  
REFERENCE TO THE CHILD SUPPORT PROCEEDINGS IN ARKANSAS AND  
MOTION *IN LIMINE* TO EXCLUDE REFERENCE TO MR. BIDEN’S  
DISCHARGE FROM THE NAVY**

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

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

*Counsel for Robert Hunter Biden*

Mr. Biden, by and through undersigned counsel, respectfully submits this Reply in support of his Motion *in limine* to exclude reference to the child support proceedings in Arkansas and reference to his discharge from the Navy. (DE 136.) Both Mr. Biden and the Special Counsel agree (DE 169 at 1), and Mr. Biden writes only to reiterate that the Court may reserve a decision on the issue of Mr. Biden's drug use in 2014 until, and if, such questioning or testimony becomes relevant. Accordingly, Mr. Biden respectfully requests that this Court grant his motion *in limine* to exclude reference to the child support proceedings in Arkansas and reference to his discharge from the Navy.

Dated: May 24, 2024

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

Respectfully submitted,

/s/ Abbe David Lowell  
Abbe David Lowell  
Christopher D. Man  
WINSTON & STRAWN  
1901 L Street NW  
Washington, D.C. 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 24th day of May, 2024, I filed the foregoing Reply in support of Mr. Biden's Motion *in Limine* 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*