

**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 REQUEST FOR AN EXTENSION OF TIME TO RESPOND
TO THE COURT’S FEBRUARY 28, 2025 ORDER (D.E. 279)**

In light of the government’s March 7, 2025 request (D.E. 281) for a 14-day extension to address the issue concerning unsealing search warrant applications and affidavits (D.E. 278), and following the Court’s March 7, 2025 Order granting of the same, Mr. Biden respectfully seeks the same extension of time to respond, so that the parties’ responses may be considered by the Court at the same time and so that Mr. Biden’s counsel can confer with the government regarding the request sought therein.

Dated: March 7, 2025

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 LLP
1901 L Street NW
Washington, D.C. 20036
Tel.: (202) 282-5000
Fax: (202) 282-5100
AbbeLowellPublicOutreach@winston.com
CMan@winston.com

David A. Kolansky
WINSTON & STRAWN LLP

200 Park Avenue
New York, New York 10166
Tel.: (212) 294-6700
DKolansky@winston.com

Counsel for Robert Hunter Biden

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2025, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ David A. Kolansky
David A. Kolansky

Counsel for Robert Hunter Biden