



U.S. Department of Justice
United States Attorney's Office
District of Delaware

The Hercules Building
1313 N. Market Street
P. O. Box 2046
Wilmington, Delaware 19899-2046

(302) 573-6277
FAX (302) 573-6220

March 21, 2025

VIA ECF

The Honorable Maryellen Noreika
U.S. District Judge
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, Delaware 19801

**Re: Order to Respond to Request to Unseal Search Warrant
Applications and Affidavits, *United States v. Robert Hunter Biden*,
1:23-CR-61-MN (D.I. 279): Request for Additional Time to Respond**

Dear Judge Noreika:

Before this Court is petitioner's request to unseal applications and affidavits in support of four search warrants. The Court has ordered the parties to provide their respective positions on the request. (D.I. 279.) The government writes to provide a status report and request for an additional thirty (30) days to provide a response which is as fulsome and helpful to the Court as possible. Counsel for Mr. Biden joins the request for an additional thirty (30) days.

In ruling on the petitioner's request for public access to these court records, this Court "should articulate the compelling, countervailing interests to be protected, make specific findings on the record concerning the effects of disclosure, and provide an opportunity for interested third parties to be heard." *In re Avandia Marketing, Sales Practices & Prods. Liability Litig.*, 924 F.3d 662, 672-3 (3d Cir. 2019). The analysis requires "careful factfinding, . . . balancing of competing interest[s,]" and a "document-by-document review of the challenged documents." *Id.* at 673.

To facilitate the Court's review and analysis, the government is in the process of identifying privacy and grand jury secrecy interests to be protected in connection with the petitioner's request to unseal. For each, the government will be proposing redactions to specified passages of the affidavits at issue along with identified interests supporting those redactions. Over the last two weeks, various equity

holders and subject matter experts within the Department of Justice and the IRS have been engaged in discussions about the interests at issue and the extent of appropriate redactions. Those efforts continue.

This process takes time. Despite diligent work on an approach which balances the various privacy and grand jury interests involved and assists the Court in making the required findings, the government needs more time to craft proposed redactions and confer with counsel for Mr. Biden. Accordingly, the parties jointly request an additional thirty (30) days to respond to the Court's Order.

Respectfully,

/s/ Shannon T. Hanson

Shannon T. Hanson
Acting United States Attorney
District of Delaware