

**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.	)	
	)	

**DEFENDANT’S CONSENT MOTION FOR AN AMENDED SCHEDULING ORDER**

Following Defendant’s initial appearance and arraignment held on October 3, 2023, Magistrate Judge Burke issued an Order setting the date for the completion of all pretrial motions by November 3, 2023. (D.E. 48, Order.) Magistrate Judge Burke’s Order advised that “[a]ny request for additional time to file pretrial motions must be filed in writing” with Your Honor. (*Id.*)

The parties in the above-captioned case have conferred, and respectfully submit the following proposed modified briefing schedule for all pretrial motions: (a) the defendant’s pretrial motions to be filed by December 11, 2023; (b) the government’s oppositions/responses to be filed by January 16, 2024; and (c) the defendant’s replies to be filed by January 30, 2024. The parties will be prepared to argue the motions, if the Court so directs, following completion of all briefing. This proposed schedule excludes deadlines for motions regarding jury selection, discovery, and motions in *limine* (which can be scheduled at a later time once a trial date is determined).

The government has consented to this briefing schedule. The parties request an exclusion of time under the Speedy Trial Act through December 11, 2023. We appreciate the Court’s time and consideration of this request.

Dated: October 13, 2023

Respectfully submitted,

**WINSTON & STRAWN LLP**

*/s/ Abbe David Lowell*

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