

Exhibit A



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ABBE DAVID LOWELL
Partner

November 15, 2023

VIA E-MAIL

Leo J. Wise
Derek E. Hines
Special Assistant United States Attorneys
Office of the Special Counsel
1313 North Market Street
Wilmington, DE 19801

Re: United States v. Robert Hunter Biden, Case No. 23-cr-00061-MN (D. Del.)

Dear Counsel:

We write to follow up on our first set of discovery requests we made on October 8, 2023. We have received your Office's first two production volumes (cover letters dated October 12 and November 2), and appreciate the material sent to date. However, these productions have not (with one or two exceptions) addressed our specific *Brady* and other requests set forth in our October 8 letter, and thus we seek the status of your response to those requests, or whether we will need to move to compel production of any material requested therein.

Our October 8 letter identified 19 specific requests (A – S) under *Brady* and its progeny, and except for a handful of search and seizure warrants and supporting law enforcement affidavits produced in Volume 001 (responsive to discovery request L), your Office has not yet produced material responsive to *any other* request in that letter. It appears your Office may have prioritized the ATF case file and supporting forms and documentation, as well as certain miscellaneous material like Apple iCloud backup reports, The Mac Shop files, podcasts and interviews of our client, and a forensic copy of the laptop and hard drive seized from The Mac Shop. In addition to our itemized *Brady* requests, your Office has not yet produced any material responsive to the following requests: (i) Rule 26/Jencks material; (ii) witness statements or interview memoranda (e.g., FBI-302s, FD-1023s, grand jury testimony, and drafts of the same); (iii) other crimes evidence; or (iv) grand jury materials/reports. Each of these requested items are spelled out in more detail in our October 8 correspondence.

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& STRAWN
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We would appreciate a response from your Office to these requests, and if you intend to produce material responsive to the above, the status of any productions. We will always seek to find a way to avoid unnecessary motions practice if we can work these issues out.

If you have any questions regarding these requests, please do not hesitate to contact me. Thank you for your consideration, and for the two productions to date.

Sincerely,

A handwritten signature in blue ink, appearing to read "Abbe David Lowell".

Abbe David Lowell