

February 9, 2023

**VIA CERTIFIED MAIL**

Mr. Guo Wengui  
781 Fifth Avenue, 18th Floor  
New York, NY, 10022

**Re: Litigation Hold Notice for Records Relating to Robert Hunter Biden**

Dear Mr. Wengui:

You have made various statements and engaged in certain activities by your own admission, or that have been publicly reported in the media, concerning our client, Robert Hunter Biden (“Mr. Biden”). This letter (“Notice”) constitutes notice that a litigation hold should be in effect for the preservation and retention of all records and documents related to Mr. Biden. This Notice should supersede the provisions of any prior records retention policy currently in effect or any otherwise applicable records management policies and procedures that would permit the destruction of affected documents, records and/or data. **This Notice shall remain in effect until further instruction from a court or from legal counsel.**

You likely possess information relevant to activities or events affecting Mr. Biden. Therefore, you are required to review and comply with this Notice. As part of this process, **you are instructed to preserve and safeguard, and must not alter, delete, destroy, or discard, any documents,<sup>1</sup> physical items, or electronically stored information<sup>2</sup> (“ESI”) and data you have relating to or concerning Mr. Biden, as more fully described below.**

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<sup>1</sup> For purposes of this Notice, “documents” is broadly defined and includes: any and all writings and records, whether in paper or electronic form, including without limitation any correspondence, memoranda, e-mails, photographs, contracts, invoices, spreadsheets, slideshow presentations, purchase orders, notes, meeting minutes, summaries, work papers, calendars, journals, ledgers and reports. This would include paper or electronic versions of final versions or drafts, and all data of any kind, including e-mail files, text messages, voicemails, instant messages (including messages on Signal, Telegram, WhatsApp, or any other messaging application), calendars, meeting invites, recordings, disks, hard-drives, CD-ROMs, flash and USB drives, tapes, databases, spreadsheets, network servers, cloud-based content or social media, cell phones, PDAs, computer tablets, other mobile devices and any other type of hardcopy or electronic document or record that relates to these inquiries, including, but not limited to, the subjects described in this hold letter.

<sup>2</sup> For purposes of this Notice, “electronically stored information” is broadly defined and includes: e-mail as well as any other information that exists in an electronic or digital form, including without limitation any electronic files with the following extensions: .pst, .doc, .exe, .xls, .pdf, .txt, .ppt, .wb2, .shw, .wpd, .tif, .gif and .jpeg; and regardless of the medium on which such

To that end, effective immediately, this Notice hereby requires you keep and preserve all documents, whether in written form or electronically stored, that are relevant or potentially relevant to the obligations described below for the period between **January 2008 and the present**. This Notice applies to all documents (hard copy or electronic) located within your home, place of business, storage facilities, or any other location, and applies to records located on any personal computers, laptops, tablets, smartphones, mobile devices, hard drives, flash and USB drives, computer discs, servers, back-up tape systems, or databases.<sup>3</sup>

**Retention Obligations:**

1. All documents, communications, and electronically stored information relating to or concerning Mr. Biden;
2. All documents, communications, and electronically stored information relating to or concerning the following business entities: Owasco P.C., Skaneateles LLC, Hudson West III, Rosemont Seneca Advisors LLC, Rosemont Seneca Partners LLC, Rosemont Seneca Thornton, RSTP II Alpha Partners, RSTP II Bravo and Equity Distribution Trust, and Rosemont Capital;
3. All documents, communications, and electronically stored information relating to or concerning any member of the Biden family;
4. All documents, communications, and electronically stored information relating to or concerning any laptop computer alleged by John Paul Mac Isaac to have been left at The Mac Shop in Delaware; and
5. Any other documents, communications, or electronically stored information relevant or potentially relevant to the above obligations.

Once you have identified such materials, please put an immediate hold on them, as it may be necessary to produce this material in litigation. This Notice applies to records currently in existence and those that may be created in the future if they are covered by the topics listed above or otherwise may be relevant to the obligations above.

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data is stored, including floppy disks, CDs, DVDs, voicemail boxes, tapes, memory sticks, hard drives and external memory devices.

<sup>3</sup> Relevant data and information includes all documents (both hardcopy and electronic), all copies or drafts, and all data of any kind, including e-mail files, text messages, voicemails, instant messages (including messages on Signal, Telegram, WhatsApp, or any other messaging application), calendars, meeting invites, recordings, disks, hard-drives, CD-ROMs, flash and USB drives, tapes, databases, spreadsheets, network servers, cloud-based content or social media, cell phones, PDAs, computer tablets, other mobile devices and any other type of hardcopy or electronic document or record that relates to these inquiries, including, but not limited to, the subjects below.

If you have an attorney to whom we should direct future correspondence, please let me know. If you have any questions concerning your responsibilities under this Notice or any of the documents, records, or data that may be subject to this Notice, please do not hesitate to contact me.

Sincerely,

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

Abbe David Lowell

*Counsel for Robert Hunter Biden*