	Case 2:23-cr-00599-MCS	Document 53-1	Filed 03/18/24	Page 1 of 3	Page ID #:1043		
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11 12	Attorneys for Robert Hui	nter Biden					
12	UNITED STATES DISTRICT COURT						
14	CENTRAL DISTRICT OF CALIFORNIA						
15							
16	UNITED STATES OF A	MERICA,	Case No. 2:2	23-cr-00599-	-MCS		
17	Plaintiff,		Hon. Mark C	C. Scarsi			
18	vs.		DEFENDAI JUDICIAL	NT'S REQU	EST FOR		
19	ROBERT HUNTER BII	DEN,	JUDICIAL	NUTICE			
20	Defendant.		Date: Marc Time: 1:00	h 27, 2024 PM			
21			Place: Court	troom 7C			
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	DEFENDANT'S REQUEST FOR JUDICIAL NOTICE CASE NO. 2:23-CR-00599-MCS-1						

Pursuant to Rule 201 of the Federal Rules of Evidence, Defendant Robert Hunter Biden requests that the Court take judicial notice of the following documents cited in his Reply in Support of his Motion to Dismiss Counts 1–4 for Improper Venue:

- Exhibit 1: A true and correct copy of the Misdemeanor Information as to Robert Hunter Biden, filed on June 20, 2023 in the District of Delaware (No. 1:23-mj-00274-MN-1) (Docket Entry 1).
- Exhibit 2: A true and correct copy of the Felony Information as to Robert Hunter Biden, filed on June 20, 2023 in the District of Delaware (No. 1:23-cr-00061-MN-1) (Docket Entry 2).

The Documents Are Judicially Noticeable Court Filings. Rule 201 permits a 10 court to notice a fact "if it is not subject to reasonable dispute." Fed. R. Evid. 201(b). A 11 12 fact is "not subject to reasonable dispute" if it is "generally known," or "can be accurately 13 and readily determined from sources whose accuracy cannot reasonably be questioned." Fed. R. Evid. 201(b)(1)-(2). This includes proceedings and filings in other courts if those 14 15 proceedings or filings are related to the matters at issue. See Grivas v. Metagenics, Inc., 2018 WL 6185977, at \*2 (C.D. Cal. Jan. 4, 2018). The Informations filed in the District 16 of Delaware were brought by the same prosecutors in a related proceeding against Mr. 17 18 Biden.

The Court may therefore appropriately take judicial notice of these documents.

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Dated: March 18, 2024

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By: <u>/s/ Angela M. Machala</u> Angela Machala (SBN: 224496) AMachala@winston.com WINSTON & STRAWN LLP 333 South Grand Avenue Los Angeles, CA 90071 Tel.: (213) 615-1924 Fax: (213) 615-1750

Respectfully submitted,

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