



**IN THE SUPERIOR COURT OF THE STATE OF DELAWARE**

JOHN PAUL MAC ISAAC, )  
 )  
 Plaintiff, )  
 )  
 v. ) C.A. No. S22C-10-012 RHR  
 )  
 CABLE NEWS NETWORK, INC., )  
 et.al., )  
 )  
 Defendants. )

**ATTACHMENT TO SUBPOENA  
TO  
U.S. FEDERAL BUREAU OF INVESTIGATION**

You are commanded to produce and permit inspection and copying of the following documents or objects (“Requests”) at the place, date, and time specified in the Subpoena:

**DEFINITIONS**

The Definitions set forth in Delaware Rules of Civil Procedure 26 and 34 are hereby incorporated and apply to these Requests. Any word in the Requests not specifically defined in this section shall have the meaning as is understood in the English language as used in the United States of America and defined in a dictionary. All such definitions apply throughout these Requests without regard to capitalization.

- 1) “Any” shall include the terms any and all.
- 2) “Communicate” or “communication” means every manner or means of disclosure, transfer, or exchange, and every disclosure, transfer, or exchange of information whether orally or by document or whether face-to-face, by telephone, mail, personal delivery, electronic delivery, electronic dissemination, or otherwise.

3) “Data” shall mean any and all information in digital form that can be transmitted or processed and includes hard drives, flash drives, forensic copies, PDA files, electronic files, electronic databases, data cells, drums, printouts, other data compilations (in any form) from which information can be obtained, all recordings made through data processing techniques, and the written information necessary to understand and use such materials.

4) “Document” means any original and/or electronic written, typewritten, handwritten, printed or recorded material, audio and/or video records, as well as all tapes, discs, non-duplicate copies and transcripts thereof, now or at any time in your possession, custody or control; and without limitation of the generality of the foregoing definition and regardless of whether claimed to be privileged, confidential or personal, or whether stored in computer memory or in a computer database, but for the purposes of illustration only, “document” includes:

memoranda, reports, books, manuals, instructions, financial reports, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, interoffice and intra office communications, contracts, cables, notations of any sort of conversation, telephone call, meeting or other communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, forecasts, statistical statements, policy statements, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars and advertisements, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including, without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings, and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, and recordings), and other written, printed, typed or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disc or videotape.

5) “Related to,” “relating to,” “regarding,” “concerning,” and “in connection with,” in addition to their other customary and usual meanings, mean alluding to, discussing, constituting,

comprising, containing, commenting upon, embodying, evidencing, supporting, mentioning, pertaining to, referring to, referencing, involving, setting forth, reflecting, stating, showing, dealing with, assessing, recording, describing, noting, pertaining to, probative of, touching upon, bearing upon, evaluating, connected with, in respect of, about, indicating, identifying, memorializing, proving, suggesting, having anything to do with, contradicting, and/or summarizing in any way, directly or indirectly, in whole or in part, the subject matter referred to in the Document Request.

## REQUESTS

- 1) Apple MacBook Pro Laptop Computer (“MacBook”); Serial Number FVFXC2MMHV29 obtained from John Paul Mac Isaac via grand jury subpoena on December 9, 2019.
- 2) Western Digital (external hard drive) (“External Hard Drive”); Serial Number WX21A19ATFF3 obtained from John Paul Mac Isaac via grand jury subpoena on December 9, 2019.
- 3) Original Quote #7469 from the Mac Shop to Hunter Biden, the original of which was taken into possession by the FBI.
- 4) Any and all documents and communications relating to the authentication of the MacBook.
- 5) Any and all documents and communications relating to the authentication of the External Hard Drive.
- 6) Any and all documents and communications relating to the authentication of the contents of the MacBook.
- 7) Any and all documents and communications relating to the authentication of the contents of the External Hard Drive.
- 8) Any and all documents and communications about or relating to Plaintiff, John Paul Mac Isaac.
- 9) Any and all documents and communications about or relating to Plaintiff’s father, Richard Steven Mac Isaac.