

**From:** [REDACTED]

**To:** "[REDACTED]"

**Subject:** FW: Draft Protective Order

**Date:** Fri, 15 Aug 2008 16:10:04 +0000

**Importance:** Normal

**Attachments:** Protective\_Order.Final.doc

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Hey Dexter – I am going to leave this to you, if that is alright. I know it is difficult when too many cooks get involved.

[REDACTED]  
Assistant U.S. Attorney  
500 S. Australian Ave, Suite 400  
West Palm Beach, FL 33401  
[REDACTED]  
[REDACTED]

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**From:** Brad Edwards [REDACTED]

**Sent:** Friday, August 15, 2008 11:59 AM

**To:** [REDACTED]  
[REDACTED]

**Subject:** RE: Draft Protective Order

This is my proposed Order. I think it comports with the Judge's order from yesterday and I think it is slightly more thorough. It is very similar to your Motion. If you are more satisfied with your wording or layout for the motion, then please incorporate the additional points made in my proposed order.

My only real problem with your proposed Order is paragraph C. This just further delays us from getting the agreement, and I do not believe the Judge placed this burden on us. I think, as I wrote in my proposed order, that it is my duty to instruct my clients on the protective order and its function and to otherwise ensure that it is not violated by my clients. Getting my clients to "acknowledge receipt of the order and agree to its terms" could take awhile and cause unnecessary delay. I plan to talk to my clients about "the agreement" and at the same time instruct them as to the rules outlined in the protective order. That is all the Judge indicated as needed to be done.

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**From:** [REDACTED]

**Sent:** Friday, August 15, 2008 11:41 AM

**To:** [REDACTED] (USAFLS)

**Subject:** Draft Protective Order

Brad,

Attached please find a draft protective order regarding the disclosure of the non-prosecution agreement to you and Jane Does 1 and 2. Please let us know if there are any changes you wish to make. Thanks.

[REDACTED]  
<<Protective Order.doc>>