

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

FGJ 07-103(WPB)
U.S. District Judge Donald M. Middlebrooks

IN RE:

GRAND JURY PROCEEDINGS

SEALED PROTECTIVE ORDER

This matter came before the Court on the United States' Sealed Application for Permission to Disclose Grand Jury Material and for Entry of a Protective Order. Having granted the Application to Disclose Grand Jury Material in a separate Order, the Court hereby enters the following Protective Order, which governs the conditions for disclosure, maintenance, and destruction of any material containing "matters occurring before the grand jury" (hereinafter referred to as "grand jury material").

Accordingly, it is HEREBY ORDERED THAT:

1. The government is authorized *nunc pro tunc* to produce to attorney Jonathan Biran of Baker Donelson grand jury material relevant to his representation of Assistant U.S. Attorney A. [REDACTED] that is necessary to: (a) allow [REDACTED] to respond to OPR's written questions; (b) prepare for OPR's interview of [REDACTED] and (c) participate fully in OPR's interview of [REDACTED]
2. The government and Mr. Biran shall make efforts to minimize the amount of grand jury material produced to or maintained by Mr. Biran. Mr. Biran shall not be given copies of subpoenas, documents produced in response to subpoenas, transcripts, proposed or completed indictments, prosecution memoranda, or items prepared for use in front of the grand jury, but these

items may be shown to Mr. Biran and discussed in preparation sessions and during interviews.

3. Any hard copies of grand jury material provided to Mr. Biran shall not be photocopied and shall be securely maintained.

4. Any digital copies of grand jury material provided to Mr. Biran shall be encrypted.

5. Any grand jury material provided to Mr. Biran can only be reviewed by him and not by anyone else in his firm.

6. At the conclusion of the OPR proceedings and any related proceedings wherein Mr. Biran represents ██████████, all grand jury material in Mr. Biran's possession shall be destroyed. Hard copy documents must be shredded and electronic documents must be deleted and purged.

DONE AND ORDERED this 31st day of May, 2019, at West Palm Beach, Florida.

Certified to be a true and correct copy of the document on file
Angela E. Noble, Clerk,
U.S. District Court
Southern District of Florida
By [Signature] Deputy Clerk
Date 5/31/19

[Signature]
DONALD M. MIDDLEBROOKS
UNITED STATES DISTRICT JUDGE

I certify that I have read and agree to be bound by the terms of this Protective Order:

Date: _____

Jonathan Biran, Esq.
Baker Donelson