

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

█

UNITED STATES

**[PROPOSED] ORDER GRANTING JANE DOE #1 AND JANE DOE #2'S MOTION FOR
ORDER DIRECTING THE U.S. ATTORNEY'S OFFICE NOT TO WITHHOLD
RELEVANT EVIDENCE**

THIS CAUSE comes before the Court on Jane Doe #1 and Jane Doe #2's Motion for Order Directing the U.S. Attorney's Office Not to Withhold Relevant Evidence, filed March 21, 2011.

It is ORDERED AND ADJUDGED that the Motion is GRANTED.

1. The government shall reveal to the victims and permit inspection and copying of all information and material known to the government which may be "favorable" to the victims, *see Brady* █, *Maryland*, 373 U.S. 83 (1963) (discussing evidence "favorable" to defendants); *United States* █, *Agurs*, 427 U.S. 97 (1976) (same), on issue of possible violations of their rights under CVRA and remedy for such violations, including any impeachment information under *Giglio* █, *United States*, 405 U.S. 150 (1972).
2. The parties shall make every possible effort in good faith to stipulate to all facts or points of law the truth and existence of which is not contested and the early resolution of which will expedite the proceedings.

3. The parties shall make to each other the disclosures required under Fed. R. Civ. P. 26(a)(1)(A).

DONE AND ORDERED in Chambers at West Palm Beach, Palm Beach County, Florida,
this ____ day of March, 2011.

KENNETH A. MARRA
United States District Judge