

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

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

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES

_____ /

**JANE DOE #1 AND JANE DOE #2'S PROTECTIVE PETITION FOR DISCLOSURE OF
GRAND JURY MATERIALS RELEVANT TO THEIR PETITION FOR
ENFORCEMENT OF THEIR CVRA RIGHTS**

COME NOW Jane Doe #1 and Jane Doe #2 (also referred to as "the victims"), by and through undersigned counsel, to file this protective petition for release of relevant grand jury materials, pursuant to Fed. R. Crim. P. 6(e)(3)(F). The protective filing is made to obviate any claim that they have not properly petitioned for release of grand jury information under the rule.

As the Court is well aware, a discovery dispute is on-going about whether certain grand jury materials can be released to the victims in this case. In its privilege log, the Government has argued at a number of points that "Rule 6(e)" of the Federal Rules of Criminal Procedure forbids release of materials to the victims in discovery. *See* DE 212-1. The victims have raised other responses to that argument. *See* Jane Doe #1 and Jane Doe #2's Motion to Compel Production of Documents That Are Not Privileged (filed contemporaneously with this petition). But in addition, the victims wish to have in the record a formal petition for release of information, as specifically provided in Rule 6(e)(3)(F) (providing authority for a petition for release of grand jury information).

The victims respectfully ask that, if their other pleadings do not already suffice to constitute such a petition, then that this document constitute such a petition. The victims further submit that they had established particularized needs and compelling reasons for such release through their various pleadings, including the Affidavit of Bradley J. Edwards, Attachment 1 to Jane Doe #1 and Jane Doe #2's Motion to Compel Production of Documents That Are Not Privileged (filed contemporaneously with this petition). The Court is authorized to grant such a petition under Fed. R. Crim. P. 6(e)(3)(E)(i). The victims ask the Court to grant their petition.

CONCLUSION

The Court should release to the victims all information that the Government claims is privileged from release by Rule 6(e).

DATED: August 16, 2013

Respectfully Submitted,

/s/ Bradley J. Edwards
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