

Government Exhibit A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DARRELL CANNON,)	
)	
Plaintiff,)	No. 05 C 2192
)	
v.)	
)	Judge St. Eve
JON BURGE, <i>et al.</i> ,)	
)	
Defendants.)	

**PROTECTIVE ORDER
FOR MATERIALS PRODUCED BY THE UNITED STATES**

This matter having been presented to this Court by Agreed Motion For a Protective Order, IT IS ORDERED that all requested materials as identified in the subpoena served by the James G. Sotos & Associates, attorneys for defendant Jon Burge and other defendants, on Assistant United States Attorney April Perry, and dated July 28, 2010, said subpoena attached as an exhibit to said agreed motion, are to be disclosed, subject to the terms and conditions of this Protective Order.

This Protective Order applies to all documents that were produced in discovery to defendant Jon Burge pursuant the protective order entered by Judge Lefkow on January 5, 2009, in *United States v. Burge*, No. 08 CR 846 (N.D. Ill.). Defendant Burge’s counsel in this case may obtain a copy of the government’s entire criminal discovery production from counsel representing Mr. Burge in his criminal case.

The protection granted by this order shall encompass the entire disclosure. Any material containing protected information that is passed on to plaintiffs’ counsel, or to other defendants’ counsel, is to be identified on the outside of the sealed parcel containing the protected information

with a legend stating: "PROTECTED MATERIAL ENCLOSED". Upon receiving the protected material, counsel for the plaintiffs and the defendants are responsible for abiding by the terms and conditions of this Protective Order.

Counsel for the plaintiffs will be provided with not more than one copy of protected material, except as otherwise agreed to by the United States Attorney. One additional copy each may be made for disclosure to the counsel for any other defendant. No other copies are to be made, other than those incidental to incorporation into a brief, or other document or material to be filed with this court. No protected material shall be filed with the court in any manner, including but not limited to, incorporation into any brief or other filing, without advance notice and an opportunity to object provided to the United States Attorney, unless the protected material shall be filed and maintained under seal.

Disclosure of the material or information contained therein is to be limited to: (1) the Court; (2) plaintiffs or defendants themselves; (3) counsel for plaintiffs and defendants and any professional, paralegal and clerical personnel who are engaged in assisting them in these civil cases; (4) any person not employed by, or under contract with the plaintiffs or defendants, who is retained by the attorneys for the plaintiffs or for the defendants, as a consultant or expert witness to assist in this civil case; and (5) any other person whom the Court has deemed to be entitled to view the protected material.

No protected material may be disclosed to a consultant or expert witness unless the individual has been designated in writing to the United States Attorney at least five (5) business days in advance of any disclosure of protected material to such individual. If objection is timely made, no protected material may be divulged to a consultant or expert without Court approval. Disclosure

shall not be made, in any event, to any consultant or expert unless the consultant or expert has signed a non-disclosure agreement with the retaining attorney. This non-disclosure agreement shall, at a minimum, require the individual to abide by the terms of this Protective Order and prohibit both the use and the disclosure, of any information or knowledge received subject to this Protective Order except in connection with this civil case.

Protected material received by counsel for the defendants, or for the plaintiffs, or the information contained therein, is to be used only for the subject matter of the instant civil case. Authorization for use or disclosure, of protected material or information contained therein, outside these court cases must be sought through appropriate motion to the Court with notice to the United States Attorney.

This order does not restrict the collection or dissemination of materials duplicative of the materials disclosed pursuant to this protective order that have been disclosed or otherwise obtained by a party in other litigation where that material was not subject to a protective order (or is subject to a less restrictive protective order) or to an agreement of the parties restricting its dissemination or to materials acquired by a party independently of the discovery disclosed pursuant to this protective order.

This order may be modified only by the written agreement of the parties and the authorized designee of the United States Attorney, with permission of the court, or by further order of the Court.

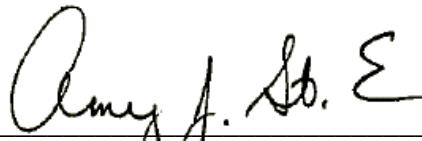
Within twenty-one (21) calendar days after a final decision on the merits in this civil case, all protected documents in the possession of plaintiffs' and defendants' counsel shall be returned to the United States Attorney, or with the prior written agreement of the United States Attorney,

retained under the terms of this Protective Order for such period as may be agreed. In the absence of such agreement and for good cause shown, the brief period for retention of this material may be extended by order of the Court.

This order does not prevent the United States Attorney from asserting any legally cognizable privilege to withhold any document or information.

Any allegations of abuse or violation of this order will be considered by the Court either for purposes of determining whether it should enter sanctions, including a contempt of court order, or for purposes of determining whether or not the matter should be referred for appropriate possible disciplinary proceedings, or both.

Date: August 31, 2010



Honorable Amy J. St. Eve
United States District Judge