UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA v. DAVID EBRAHIMZADEH	Criminal No. 25-cr-10455-RGS

[PROPOSED] PROTECTIVE ORDER

Upon consideration of the government's Assented-To Motion for a Protective Order, and pursuant to Federal Rule of Criminal Procedure 16(d), it is hereby **ORDERED** that:

1) The discovery materials produced by the government in this case may be used by the defendant, defendant's counsel and their office staff (the "defense team"), and any experts or employees or agents of defendant's counsel solely in defense of this case, including any appeal, and for no other purpose and in connection with no other proceeding.

2) The defendant and defense team shall not disclose any discovery materials, directly or indirectly, to any other person except those assisting in the defense of the case, persons who are interviewed as potential witnesses, or potential experts employed during the course of and as necessitated by the investigation and defense of this case.

3) Except in the case of expert witnesses, copies of discovery materials may only be shown to or played for, but not given to, potential witnesses.

4) The government may designate as confidential certain materials it produces in discovery, whether pursuant to the Federal Rules, the Local Rules, or on a voluntary basis, which

materials contain particularly personal or sensitive information regarding an individual or entity, the dissemination of which could pose a serious risk of harm to any individual or entity or obstruct the government's ongoing investigation (hereafter referred to as "Confidential Discovery Materials").

5) To designate discovery materials as Confidential Discovery Materials, the government will label the document (or, in the case of audio/video recordings, the filename and/or the storage media upon which it is stored) "Confidential."

6) The defense team shall maintain any discovery materials marked confidential by the government ("the Confidential Discovery Materials"), including any copies the defense makes, as follows:

a) Except as provided below, the defense team shall maintain possession of all copies of the Confidential Discovery Materials. No copy may be left in the possession of the defendant, nor may the defendant write down, photograph, or otherwise record the content of the Confidential Discovery Materials.

b) Only the defense team, the defendant, and any experts or other trial preparation professionals ("defense professionals") designated by the defense team may view the Confidential Discovery Materials. The defendant may access and view the Confidential Discovery Materials solely in the presence of the defense team (defense counsel or their office staff) and under the direct supervision and control of the defense team.

c) In no event shall the defense team or the defendant disclose or describe any of the Confidential Discovery Materials to any other person or entity other

than the government or this Court, other than under the terms laid out below, or as necessary during a court proceeding, subject to redactions protecting confidential information or under seal after seeking permission in accordance with the Federal Rules of Criminal Procedure and this Court's Local Rules.

7) The defense team and the defendant may describe or provide copies of the Confidential Discovery Materials to any defense professional retained by them, but only if:

a) The defense professional signs a copy of this Order, and by doing so, agrees to maintain the Confidential Discovery Materials in accordance with the above procedures as if they were members of the defense team and solely for the purposes of assisting the defense in this case, and not for any commercial or other purpose; and

b) The procedures outlined above shall govern the defense professional's use, maintenance, disclosure, and safekeeping of the evidence, except that the defense professional may maintain the discovery materials at their offices, but only under the same secure conditions provided above.

8) Defense counsel shall promptly notify the government and the Court if any Confidential Discovery Materials are disclosed to anyone not designated by this Order or further order of the Court, either intentionally or unintentionally. The defendant and any defense professional shall promptly notify defense counsel of any such disclosures.

9) At the end of these proceedings, the defendants, the defense team, and the defense professionals shall return the Confidential Discovery Materials to the government or certify to the

government that the Confidential Discovery Materials have been destroyed.

10) The defendant may challenge the government's designation of any material as Confidential by first raising the issue with the government and, if the parties cannot agree, by raising it with the Court.

11) Nothing in this Order will preclude any party from applying to the Court for further relief or for modification of any provision hereof.

Dated: Jan 16, 2026

HON. DAVID H. HENNESSY
United States Magistrate Judge

Acknowledged by: _____
Individual receiving Confidential Discovery Materials