

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION**

UNITED STATES OF AMERICA	)	
	)	
v.	)	CASE NO: 3:22-CR-09
	)	
GLADYS HARUN	)	

JOINT MOTION FOR A PROTECTIVE ORDER
GOVERNING CERTAIN DISCOVERY

The United States and counsel for Defendant Gladys Harun jointly seek a protective order concerning the disclosure of information produced in response to three recent search warrants. Such warrants encompass a cellular phone (doc. 59), a Google email address (doc. 55), and a Yahoo email address (doc. 51).

There is a reasonable possibility that materials to be reviewed from the return of such warrants may include privileged information. Accordingly, the parties have conferred regarding a process they believe appropriate to (1) protect Defendant's attorney-client and work-product privileges as well as Defendant's Constitutional rights, and (2) to prevent the disclosure of privileged and/or otherwise Constitutionally protected attorney-client information to case agents, investigators, and prosecutors assigned to the investigation. Such process is set forth in the proposed order.

WHEREFORE, the United States and counsel for Defendant Gladys Harun respectfully request the Court enter a protective order as set forth in the parties' proposed submission.

Respectfully submitted,

/s/ Chris Howard

Chris Howard
Assistant United States Attorney
N.Y. Bar Number 4935938
P.O. Box 8970
Savannah, GA 31412

/s/ D. Robert Busbee

D. Robert Busbee
Counsel for Defendant
Georgia Bar Number 186336
Busbee Law Group LLC
8 E. Grady St.
Statesboro, GA 30458