

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	No. 22-cr-74-PB-01/02
PIERRE ROGERS and	)	
JOSHUA LEAVITT,	)	
	)	
Defendants	)	

Protective Order

Upon consideration of the government's assented-to motion for a protective order regarding discovery to be produced in this case (the "Discovery Material"), pursuant to [Fed. R. Crim. P. 16\(d\)\(1\)](#), it is hereby

ORDERED

1. For purpose of this Order, the term "defense team" means defense counsel, defense counsel's staff, and anyone directly engaged by defense counsel to assist in preparing and presenting a defense, including sentencing arguments, in this case. The "defendants" are Pierre Rogers and Joshua Leavitt.
2. The Discovery Material shall be used by the defendants and their defense teams only as necessary to prepare and present a defense in this case.
3. Defense counsel shall maintain custody of the Discovery Material and shall not make copies of the Discovery Material unless necessary to provide them to the defendants or other member(s) of the defense teams who will use the copies only to assist in the defense of this case. All copies of Discovery Material, including those provided to member(s) of the defense team and the defendants, are subject to and protected by this Order.

4. Defense counsel shall show and provide copies of Discovery Material only to the defendants and members of the defense teams. In showing or providing copies of Discovery Material, defense counsel must take steps that reasonably assure that the Discovery Material will not be viewed by any other person who is not a defendant or a member of the defense teams.

5. Defense counsel may provide a copy of the Discovery Material to the defendants. If defense counsel provides a copy of Discovery Material to the defendants, defense counsel must also provide the defendants with a copy of this Order and explain its terms. The defendants shall not make any copies of the Discovery Material. The defendants shall not show or otherwise provide Discovery Material to anyone who is not a member of the defense team and shall only use Discovery Material to assist in the defense of this case.

6. Defense counsel shall collect and destroy any and all copies of the Discovery Material when it is no longer needed by the defendants or the other members of the defense teams to prepare and present a defense in this case.

7. At the conclusion of this matter, defense counsel shall either return all Discovery Material and remaining copies of Discovery Material (including, but not limited to all copies in the possession of the defendants or any member of the defense teams) to the United States Attorney's office or destroy all such material. If defense counsel destroys the Discovery Material, defense counsel shall certify to the United States within 30 days of conclusion of this matter that the Discovery Material and all copies of the Discovery Material (including, but not limited to all copies in the possession of the defendant or any member of the defense team) have been destroyed. The term "conclusion of this matter" shall include the exhaustion of appeals and collateral review.

Date: 7/12/2022

/s/Paul Barbadoro
Hon. Paul J. Barbadoro
United States District Judge
District of New Hampshire