

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

Civil Action No. 98-1232 (CKK)

[PROPOSED] SUPPLEMENTAL PROTECTIVE ORDER

The United States of America, Plaintiff in *United States v. Microsoft*, CA No. 98-1232 (CKK), and the States of New York, Ohio, Illinois, Kentucky, Louisiana, Maryland, Michigan, North Carolina, and Wisconsin (the “New York Group”), the settling Plaintiffs in *New York, et al. v. Microsoft*, CA No. 98-1233 (CKK) (collectively “Plaintiffs”), together with Defendant Microsoft, having filed a Joint Motion for a Supplemental Protective Order to ensure the confidentiality of materials relating to the Technical Committee (“TC”) and to Plaintiffs’ enforcement of the Final Judgments, and good cause being shown pursuant to Rule 26 of the Federal Rules of Civil Procedure and the Court’s inherent authority to enforce its previous Protective Order, it is hereby ORDERED that:

1. All members of the TC and all consultants or staff hired by the TC shall return all documents and materials relating to his or her work for the TC to the United States within three business days of the date of this Order.

2. No member of the Technical Committee or any consultant or staff hired by the TC shall retain any document or material that contains Highly Confidential Information covered by the Protective Order in this case, including but not limited to any document or material relating to the TC's activities, following the deadline for returning any such document or material to the United States set forth in the previous paragraph.
3. No member of the TC or any consultant or staff hired by the TC shall make any public statement regarding the TC's activities. A pleading or other document filed with the Clerk of the Court is a public statement for the purpose of this paragraph.
4. Upon request of any party to this action, any member of the TC or any consultant or staff hired by the TC shall submit to the requesting party a sworn statement affirming his or her compliance with this Order.

SO ORDERED, this ____ day of _____, 2011:

Colleen Kollar-Kotelly
United States District Judge