

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**REALITY LEIGH WINNER,**

**Defendant.**

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**CR 117-34**

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**GOVERNMENT’S UNOPPOSED MOTION FOR SUPPLEMENTAL PROTECTIVE  
ORDER PURSUANT TO SECTION 3 OF THE CLASSIFIED INFORMATION  
PROCEDURES ACT**

Pursuant to Section 3 of the Classified Information Procedures Act, 18 U.S.C. App. III (“CIPA”), the “Revised Security Procedures Established Pursuant to Pub. L. 96-456, 94 Stat. 2025, by the Chief Justice of the United States for the Protection of Classified Information” (“Security Procedures”) (reprinted after CIPA Section 9), Rules 16 and 57 of the Federal Rules of Criminal Procedure, and the general supervisory powers of the Court, and to protect the national security, the United States, with the consent of defendant Reality Leigh Winner, moves for the attached proposed Supplemental Protective Order regarding the disclosure and dissemination of classified national security information.

During the litigation of this case, the defendant and her counsel will be provided access to United States Government documents and information that have been classified for reasons of national security. On August 3, 2017, this Court entered a Protective Order under Section 3 of CIPA governing classified information the government provides in discovery to the defense, and directed the parties to propose a separate Order governing the disclosure of such information by

the defense to the defendant. The defense has reviewed the proposed Supplemental Protective Order submitted with this Motion, and consents to the proposed Order as drafted.

WHEREFORE, the Government respectfully requests, with the consent of defense counsel, that the Court issue the attached Supplemental Protective Order.

Respectfully submitted,

JAMES D. DURHAM  
ACTING UNITED STATES ATTORNEY

By: /s/ Jennifer G. Solari  
Jennifer G. Solari  
Assistant United States Attorney  
Southern District of Georgia

/s/ Julie A. Edelstein  
Julie A. Edelstein  
Trial Attorney  
U.S. Department of Justice  
National Security Division

/s/ David C. Aaron  
David C. Aaron  
Trial Attorney  
U.S. Department of Justice  
National Security Division

**CERTIFICATE OF SERVICE**

This is to certify that I have on this day served all the parties in this case in accordance with the notice of electronic filing ("NEF") which was generated as a result of electronic filing in this Court.

This 15th day of August, 2017.

JAMES D. DURHAM  
ACTING UNITED STATES ATTORNEY

*//s// Jennifer G. Solari*

Jennifer G. Solari  
Assistant United States Attorney

Post Office Box 8970  
Savannah, Georgia 31401  
Telephone No: 912-652-4422