



3. Litigation counsel for the Kean Committee, Anthony S. Cicatiello, and Tom Kean, Jr. may not share the confidential information with any other person or entity except as provided in Paragraph 6 of this Order.

4. Information provided to litigation counsel for the Kean Committee, Anthony S. Cicatiello, and Tom Kean, Jr., pursuant to this Protective Order shall be used solely in connection with this litigation.

5. Counsel for the parties shall mark each document that contains information covered by 2 U.S.C. 437g(a)(12)(A) and 11 C.F.R. 111.21(a) with an appropriate marking such as “Confidential Information.”

6. The parties may submit nonpublic, confidential information to the Court provided that they file under seal the motions or other papers containing or disclosing the confidential matters.

7. When this litigation is concluded, litigation counsel for the Kean Committee, Anthony S. Cicatiello, and Tom Kean, Jr., shall either (a) return to the Commission within ten business days all copies of any confidential documents the Commission has provided or (b) destroy all copies within ten business days and inform the Commission in writing of the destruction, except that counsel for the Kean Committee may retain one copy of any confidential material that was filed with this Court in this litigation.

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Date

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John D. Bates  
United States District Judge