

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

AARON SWARTZ,

Defendant.

Crim. No. 11-CR-10260-NMG

**JOINT SUBMISSION OF PROPOSED
MODIFICATION TO PROTECTIVE ORDER**

As directed by the Court per its Order dated May 13, 2013, the United States, the Estate of Aaron Swartz, and Intervenor the Massachusetts Institute of Technology (“MIT”) and Ithaca Harbors, Inc. d/b/a JSTOR (“JSTOR”) hereby jointly submit the attached Proposed Modification to Protective Order.

Respectfully submitted,

<p><u>/s/ Jack W. Pirozzolo</u> Jack W. Pirozzolo First Assistant U.S. Attorney John Joseph Moakley United States Courthouse 1 Courthouse Way, Suite 9200 Boston, MA 02210 Tel.: (617) 748-3189 Email: jack.pirozzolo@usdoj.gov</p>	<p><u>/s/ Michael J. Pineault</u> Michael J. Pineault Clements & Pineault, LLP 24 Federal Street Boston, MA 02110 Tel.: (857) 445-0135 Fax: (857) 366-5404 Email: mpineault@clementspineault.com Attorney for the Estate of AARON SWARTZ</p>

<p><u>/s/ Jonathan Kotlier</u> Jonathan Kotlier Nutter, McClennen & Fish, LLP Seaport West, 155 Seaport Blvd. Boston, MA 02210 Tel.: (617) 439-2000 Fax: (617) 310-9000 Email: jkotlier@nutter.com Attorney for MIT</p>	<p><u>/s/ Mark W. Pearlstein</u> Mark W. Pearlstein McDermott Will & Emery 28 State Street Boston, MA 02109 Tel.: (617) 535-4425 Email: mpearlstein@mwe.com Jeremy Feigelson, (of counsel) DEBEVOISE & PLIMPTON LLP 919 Third Avenue New York, NY 10022 Tel.: (212) 909-6000 Email: jfeigelson@debevoise.com Attorneys for JSTOR</p>
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Dated: May 31, 2013

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent to those indicated as non -registered participants via first class mail:

/s/ Michael J. Pineault
Michael J. Pineault