

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

AARON SWARTZ,

Defendant.

Crim. No. 11-CR-10260-NMG

**SUPPLEMENTAL CERTIFICATION OF COMPLIANCE
WITH PROTECTIVE ORDER**

On behalf of the estate of Aaron Swartz, I hereby supplement my previous June 10, 2013 Certification of Compliance with Protective order as follows:

1. Keker & Van Nest LLP has destroyed all copies in its possession of all Discovery Documents (as that term is defined in paragraph 1(a) of this Court's June 3, 2013 Order modifying the protective order in this case) not permitted to be retained under paragraph 1(b) of this Court's June 3, 2013 Order.

2. Except for the 2 copies of the Discovery Documents permitted to be retained under paragraph 1(b) of this Court's June 3, 2013 Order, I have requested and received written confirmation of the destruction of all copies of the Discovery Documents or any portion thereof ever held by: (a) all persons still living whom Keker & Van Nest is aware possessed such documents; and (b) all persons (if any) who predecessor counsel or a member of the "defense" (as that term is defined in paragraph 1 of the November 30, 2011 Protective Order in this case) identified as possessing such documents, including predecessor counsel and the members of the "defense" themselves. In requesting and receiving the latter confirmations, I asked predecessor counsel and each living member of the "defense" either to confirm that no copies of the Discovery Documents were provided to third parties or to identify anyone whom they knew had received or ever possessed such materials.

3. I am not aware of the existence of any Discovery Documents, or any portion thereof, that have not been destroyed, except for the two copies permitted to be retained under paragraph 1(b) of this Court's June 3, 2013 Order.

Dated: July 12, 2013

Respectfully submitted,

/s/ Daniel Purcell

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Attorneys for THE ESTATE OF AARON
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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 NEF (NEF), that paper copies will be sent to those indicated as non -registered participants, and that copies simultaneously will be served by overnight mail on the following attorneys:

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/s/ Daniel Purcell

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