

protocols, (ii) offered Affidavits from those individuals detailing the actual security protocols to be implemented, (iii) identified where the facilities would be located, or (iv) identified which “experts” will have access to the malware for examination (whether such experts include the IT representatives employed by the Secretary of State or the retained expert Dr. Shamos).

Accordingly, the Court **DIRECTS** the State Defendants to file a Notice and supporting Affidavits identifying and explaining the following **NO LATER THAN MIDNIGHT TONIGHT, JULY 16, 2019**: (i) the proposed location of a secure facility for storage and examination of the malware; (ii) details of the actual security protocols to be implemented; (iii) the names and professional backgrounds of the individuals responsible for implementing and enforcing the security protocols, (iv) the names and professional backgrounds of the experts who will have access to the malware for examination (whether such experts include the IT representatives employed by the Secretary of State or the retained expert Dr. Shamos) and whether they agree to sign confidentiality agreements and be bound by the terms of the Protective Order entered in this case; (v) whether the State Defendants are proposing to transmit a copy of the memory card contents to Dr. Shamos and how; and if so, (vi) the proposed arrangement for transmission/delivery of the memory card to Dr. Shamos and by whom.

The Court **DIRECTS** Plaintiffs to file any Reply, if necessary, **NO LATER THAN 1:00 PM, JULY 17, 2019**.

Finally, the Court **DIRECTS** the parties to identify for the Court any scheduling conflicts they each have tomorrow afternoon through 6:00 pm for a telephone conference if necessary.

IT IS SO ORDERED this 16th day of July, 2019.



Amy Totenberg
United States District Judge