

2006 JUN 5 11:00 AM
U.S. DISTRICT COURT
SAN FRANCISCO

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
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14 In re GRAND JURY SUBPOENA, dated)
15 February 1, 2006,)
16)
17 JOSHUA WOLF,)
18 Subpoenaed Party.)
19)

No. CR 06-90064 WHA
UNITED STATES' MOTION TO
DISCLOSE GRAND JURY MATTER
AND ~~PROPOSED~~ ORDER

~~UNDER SEAL~~

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21 Pursuant to Federal Rule of Criminal Procedure 6(e)(3)(E)(i), the United States hereby
22 requests this Court to authorize the disclosure of grand jury matter to the law offices of Siegel &
23 Yee, counsel for grand jury witness Joshua Wolf. The United States wishes to produce a copy of
24 the transcript of the grand jury proceedings involving Mr. Wolf on June 15, 2006. The basis for
25 the disclosure is that the material relates to a judicial proceeding, i.e. the Order To Show Cause
26 Why Joshua Wolf Should Not Be Held in Civil Contempt, which will be filed by the
27 government. Rule 6(e)(3)(E)(i) states that the Court may authorize disclosure of grand jury
28 matter: "preliminary to or in connection with a judicial proceeding." Further, since the transcript

MOTION TO DISCLOSE GRAND JURY MATTER
~~(UNDER SEAL)~~

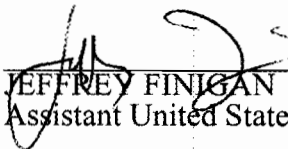
1 itself contains matter that occurred before the grand jury, the United States respectfully requests
2 that this Court allow the aforementioned disclosure under the condition that no member and/or
3 employee of Siegel & Yee shall reveal the contents of or disseminate in any manner the
4 transcript to anyone outside of Siegel & Yee with the exception that the transcript may be
5 referred to and/or attached to under seal pleadings related to this matter. The government further
6 requests that Siegel & Yee be permitted to allow their client, Mr. Wolf, to review the transcript
7 in connection with their representation, but that a copy may not be provided to Mr. Wolf.

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DATED: July 3, 2006

Respectfully submitted,

KEVIN V. RYAN
United States Attorney


JEFFREY FINIGAN
Assistant United States Attorney

1 **ORDER**

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3 Based upon the motion of the government and for good cause shown, IT IS HEREBY
4 ORDERED that:

- 5 1. The United States may provide a copy of the grand jury transcript of the proceedings
6 involving Mr. Wolf on June 15, 2006, to Siegel & Yee ;
- 7 2. No member and/or employee of Siegel & Yee shall reveal the contents of or disseminate
8 in any manner the transcript referred to in paragraph 1 to anyone outside of Siegel & Yee
9 with the exception that the transcript may be referred to and/or attached to under seal
10 pleadings related to this matter;
- 11 3. Siegel & Yee may allow their client, Mr. Wolf, to review the transcript in connection
12 with their representation, but a copy may not be provided to Mr. Wolf; and

13 4. Siegel & Yee may object to this order and/or propose modified terms, if such
14 request is filed by Tuesday, July 11, 2006.
15 This order and motion may not be filed under seal.

16 DATED: 7/5/06

17 WHS
18 WILLIAM H. ALSUP
19 United States District Court Judge
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