

Exhibit A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

[PROPOSED ORDER]

Case No. 1:18-cr-00204-NGG-VMS

v.

KEITH RANIERE,

Defendant.

-----X

Upon the October 23, 2023 application by Mr. Ranieri,

IT IS HEREBY ORDERED that the Government produce the forensic copies, referred to as files named NYC024299.E01 and NYC02499_01.E01, from a camera's memory card identified as 1B15a, as well as any and all associated log files (collectively the "camera card evidence"), within seventy-two (72) hours of this Order.

The Government **shall** in such production of the "camera card evidence":

1. Use Robocopy to directly copy each image file (NYC024299.E01 and NYC024299_1B15a.E01) from their respective file paths¹ on the CART SAN (storage area network).
2. Provide to the Defense all copies of the image files stored on backup tapes, or on other media stored in Evidence Control, again using Robocopy.

¹ The respective file paths are: \\nycart-fs\cases05\NY-2233091_208206\Evidence\NYC024299\NYC024299.001 and \\nycart-fs\CASES02\NY2233091_196817\Evidence\NYC024299_1B15a\NYC024299_1B15a.E01.

3. Provide to the Defense all copies of the image files that were created as “derivative evidence,” either as working copies, or copies given to agents, the USAO, or other personnel or individuals outside of CART.
4. Provide to the Defense all image logs and file listings accompanying all the above items.
5. Provide to the Defense documentation (e.g., examination notes) recording the tools used and the methods followed to provide the above items, and signed and dated by the person who performed them.
6. Provide to the Defense a complete chain of custody for all the above items, from the time each image was created, to the time its copy is finally provided to the defense.

It is further ORDERED that the Government file with the Clerk of this Court a Certification that the “camera card evidence” has been provided to the Defendant’s attorney by the close of the next business day after the material has been so provided.

Dated: Brooklyn, New York
October _____, 2023

The Honorable Nicholas G. Garaufis
United States District Court
Eastern District of New York