

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

UNITED STATES OF AMERICA)	
)	
)	
v.)	CR. NO. 05-394 (RBW)
)	
I. LEWIS LIBBY)	
also known as "Scooter Libby,")	
Defendant.)	

PROPOSED ORDER

Upon consideration of the defendant's Motion to Compel Discovery of Information Regarding News Reporters and Organizations, and of the government's response thereto, it is hereby

ORDERED that the government shall disclose to the defendant the following documents within the government's possession, custody or control, and information that is known or that by the exercise of reasonable diligence may become known to the Office of Special Counsel:

1. All documents and other information reflecting knowledge by any news reporter or employee of a news organization of Valerie Plame Wilson's possible affiliation with the CIA or her role in connection with Joseph Wilson's trip to Niger prior to July 14, 2003.

2. All documents and other information reflecting any mention of Valerie Plame Wilson in any communication between a news reporter and a government official, another news reporter, an employee of a news organization, or any other person prior to July 14, 2003.

3. Copies of subpoenas issued to reporters and news organizations during the grand jury investigation, and any agreements by the FBI or Office of Special Counsel to limit the scope of the information supplied pursuant to those subpoenas.

As used in this Order, the term “documents” includes all written or recorded materials of any kind, all e-mails and electronically stored information, and all video or audio recordings. Documents and information are responsive as long as they relate to events or communications that occurred prior to July 14, 2003, even if they were generated after that date. The term “Valerie Plame Wilson” means the wife of former Ambassador Joseph Wilson, whether referred to by name (including the names Valerie Plame, Valerie Wilson, Victoria Wilson, and Valerie Flame), or by other reference such as “Wilson’s wife” or “wife” or initials where the reference is believed to concern Valerie Plame Wilson.

Dated: _____

HON. REGGIE B. WALTON
UNITED STATES DISTRICT JUDGE

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