

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

AARON SWARTZ,

Defendant.

Crim. No. 11-CR-10260-NMG

**JOINT MOTION FOR 4-DAY EXTENSION OF TIME
TO SUBMIT PROPOSED MODIFICATION TO PROTECTIVE ORDER**

The United States, the Estate of Aaron Swartz, and Intervenor the Massachusetts Institute of Technology (“MIT”) and Ithaca Harbors, Inc. d/b/a JSTOR (“JSTOR”) hereby jointly move for a 4-day extension of time, until May 31, 2013, to submit a joint proposed order for modification of the Protective Order in this matter, as directed by the Court per its Order dated May 13, 2013.

As grounds, the movants state that they are working diligently to draft mutually acceptable language and seek a short extension of time to complete that process.

Respectfully submitted,

/s/ Jack W. Pirozzolo

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<p><u>/s/ Jonathan Kotlier</u> Jonathan Kotlier Nutter, McClennen & Fish, LLP Seaport West, 155 Seaport Blvd. Boston, MA 02210 Tel.: (617) 439-2000 Fax: (617) 310-9000 Email: jkotlier@nutter.com</p> <p>Attorney for MIT</p>	<p><u>/s/ Mark W. Pearlstein</u> Mark W. Pearlstein McDermott Will & Emery 28 State Street Boston, MA 02109 Tel.: (617) 535-4425 Email: mpearlstein@mwe.com</p> <p>Jeremy Feigleson, (of counsel) DEBEVOISE & PLIMPTON LLP 919 Third Avenue New York, NY 10022 Tel.: (212) 909-6000 Email: jfeigelson@debevoise.com</p> <p>Attorneys for JSTOR</p>
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Dated: May 28, 2013

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 Notice of Electronic Filing and that paper copies will be sent to those indicated as non -registered participants via first class mail:

/s/ Michael J. Pineault
Michael J. Pineault