

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

UNITED STATES OF AMERICA

v.

AARON SWARTZ,

Defendant

Crim. No. 11-CR-10260-NMG

**JOINT MOTION FOR MODIFICATION OF TIME PERIOD FOR
PREPARATION AND REVIEW OF REDACTIONS PURSUANT TO
THE COURT'S JUNE 3, 2013 ORDER**

The United States, the Estate of Aaron Swartz, and Intervenors the Massachusetts Institute of Technology (“MIT”) and Ithaca Harbors d/b/a JSTOR (“JSTOR”) (collectively the “Parties”) hereby jointly move to modify the time frame for the redaction process set forth in this Court’s Order dated June 3, 2013 (Dkt. 127). The Parties request that the date for delivery of the redacted discovery materials (as described in the Order) to the Estate for its review be moved from August 9, 2013 to August 16, 2013. The Parties further request that the date by which the Estate must submit objections to the redactions be moved from August 23, 2013 to September 13, 2013. As grounds for this Motion, the Parties state that they are working diligently to prepare and review the redacted set of discovery materials, but need the additional time to complete the review of the materials.

Respectfully submitted,

<p><u>/s/ Jack W. Pirozzolo</u> Jack W. Pirozzolo First Assistant U.S. Attorney United States Attorney's Office Moakley Federal Courthouse 1 Courthouse Way, Suite 9200 Boston, MA 02210 Tel: (617) 748-3189</p>	<p><u>/s/ Michael J. Pineault</u> Michael J. Pineault Clements & Pineault, LLP 224 Federal Street Boston, MA 02110 Tel: (857) 445-0135 Fax: (857) 366-5404 Email: mpineault@clementspineault.com</p> <p>Attorney for defendant AARON SWARTZ</p>
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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 Feigelson (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: August 9, 2013

CERTIFICATE OF SERVICE

I, Jack W. Pirozzolo, hereby certify that on August 9, 2013, I served a copy of the foregoing motion via electronic filing on counsel for the Estate, JSTOR and MIT.

/s/ Jack W. Pirozzolo

Jack W. Pirozzolo