

FILED

JUL 30, 2026

Clerk, Alien Terrorist Removal Court of
the United StatesALIEN TERRORIST REMOVAL COURT
OF THE UNITED STATES

Washington, D.C.

In the matter of:

NAZIRA HAJI ZADA,

Respondent.

Case No. 2026-TRC-1 (JNE)**AGREED PROTECTIVE ORDER GOVERNING DISCOVERY**

THIS CAUSE having come before the Court on the agreement of the parties and the Court being duly advised in the premises it is hereby ORDERED:

1. Counsel for the Attorney General is authorized to disclose personal identification information, sensitive financial information, and other sensitive information in its possession that it deems necessary to carry out these proceedings.

2. Counsel for the Attorney General shall identify that portion of the discovery that includes personal identification information, private health information, sensitive financial information and other sensitive information as "Confidential."

3. Respondent and Respondent's counsel shall not disclose the Confidential materials or their contents directly or indirectly to any person or entity other than persons employed to assist in the Respondent's case and other persons to whom counsel for the Attorney General may authorize disclosure (collectively, "authorized persons"). Respondent and Respondent's counsel shall not disclose the Confidential materials either directly or indirectly to any person or entity outside of the United States without prior authorization from counsel for the Attorney General.

4. Certain Confidential materials disclosed or to be disclosed by the Attorney General contain particularly sensitive information, including recordings, transcripts of recordings, reports, personal identifying information ("PII"), and other materials pertaining to interviews of the

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Respondent and other individuals, including juveniles. Additionally, the actual name or cover name, identifier, or online account name used by any Federal Bureau of Investigation ("FBI") Confidential Human Source ("CHS"), FBI Online Covert Employee ("OCE"), or FBI Undercover Employee ("UCE") may be redacted from discovery. To the extent that the Respondent or counsel for the Respondent may learn, or believe that they have knowledge of any actual or cover name, online account name, or information that could reasonably identify any FBI CHS, OCE, or UCE, to include descriptors, photographs, or video/audio recordings that may identify such individuals, the parties will not disclose, publicly or in any hearing, any such information. No such materials, or the information contained therein, may be copied without prior authorization from counsel for the Attorney General.

5. Confidential materials shall not be left in the possession of the Respondent, whether at a detention facility, halfway house, or while the Respondent is on release pending removal proceedings in any court, including all appeals. Absent prior permission from counsel for the Attorney General, that information shall not be included in any public filing with the Court, and instead shall be submitted under seal (except if the Respondent chooses to include in a public document sensitive information relating solely and directly to the Respondent).

6. Respondent, Respondent's counsel, and authorized persons shall not copy or reproduce any of the Confidential materials not specified in paragraph four, except in order to provide copies of the Confidential materials for use in connection with this case by Respondent, Respondent's counsel, and authorized persons. Such copies and reproduction shall be treated in the same manner as the original materials.

7. Respondent, Respondent's counsel, and authorized persons shall not disclose any notes or records of any kind that they make in relation to the contents of the Confidential materials,

other than to authorized persons, and all such notes or records are to be treated in the same manner as the original materials.

8. Before providing Confidential materials to an authorized person, Respondent's counsel must provide the authorized person with a copy of the Protective Order. Respondent counsel shall maintain a list of persons to whom Confidential materials are disclosed.

9. Upon conclusion of all stages of this case, all of the Confidential materials and all copies made thereof shall be returned to the counsel for the Attorney General, unless otherwise agreed to by counsel for the Attorney General and ordered by the Court. The Court may require a certification as to the disposition of any such materials.

10. To the extent any material is produced by counsel for the Attorney General to Respondent or Respondent's counsel by mistake, the counsel for the Attorney General shall have the right to request the return of the material and shall do so in writing. Within five days of the receipt of such a request, Respondent and/or Respondent's counsel shall return all such material if in hard copy, and in the case of electronic materials, shall certify in writing that all copies of the specified material have been deleted from any location in which the material was stored.

11. Nothing in this Order shall restrict use by the parties of Confidential material or information contained therein during the parties' investigation of the allegations, litigation, or introduction as evidence in removal proceedings, except that any documents, papers, or pleadings filed with the Court that (a) quote directly from the Confidential materials; (b) summarize or refer to the contents of the Confidential materials; or (c) attach copies of the Confidential materials, shall be filed under seal, unless the parties agree to the public filing of such information, or such information has already been publicly disclosed, or the Court rules that it may be filed on the public docket. The procedures for use of designated Confidential documents during any hearing of this

matter shall be determined by the parties and the Court in advance of the hearing. No party shall disclose designated Confidential documents in open Court without prior consideration by the Court.

12. Respondent's counsel shall maintain all Confidential information in a secure and safe area and shall exercise the same standards of due and proper care with respect to the storage, custody, use, and or/or dissemination of such information as are exercised by the recipient with respect to his own confidential information. In addition, non-party recipients of any Confidential information pursuant to this Protective Order shall have in place appropriate administrative, technical, and physical safeguards to protect against impermissible disclosure of the Confidential information.

13. Nothing in this Order shall prevent any party from seeking modification of this Protective Order. The party seeking modification must first discuss any proposed modifications with opposing counsel and attempt to reach resolution before seeking a modification from this Court.

14. Nothing in this Order shall prevent counsel for the Attorney General from seeking additional protective orders as may be necessary to protect against disclosure of classified information.

15. All discovery information that may be provided as part of the discovery materials in this case is now and will forever remain the property of the United States.

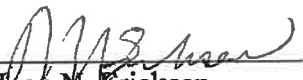
16. The Order shall survive the termination of this removal case and shall continue in full force and effect thereafter.

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17. Parties have agreed to the terms of this Order.

SO ORDERED this July 30, 2026.

By:



Hon. Joan N. Ericksen
Chief Judge
Alien Terrorist Removal Court