UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. JOHN R. BOLTON, Defendant.	)	Civil Action No. 20-1580 (RCL)

[PROPOSED] ORDER

It is hereby ORDERED that the United States' Motion for a [Temporary Restraining Order] [Preliminary Injunction] is GRANTED. It is FURTHER ORDERED that:

Defendant is enjoined from proceeding with the publication of his book in any form or media without first obtaining written authorization from the United States through the prepublication review process;

Defendant is required to ensure that his publisher and resellers receive notice that the book contains classified information that he was not authorized to disclose;

Defendant is required to instruct his publisher to delay the release date of the book pending the completion of the prepublication review process and authorization from the United States that no classified information remains in the book;

Defendant is required to instruct his publisher to take any and all available steps to retrieve and destroy any copies of the book that may be in the possession of any third party;

Defendant is further enjoined from taking any additional steps toward public disclosing classified information without first obtaining authorization from the United States through the prepublication review process;

Defendant is required to ensure that his publisher and resellers receive notice of this Order; and

This injunction binds Defendant, along with his "officers, agents, servants, employees, and attorneys," and "all other persons who are in active concert or participation with" him, if they receive actual notice of the order, Fed. R. Civ. P. 65(d)(2), including Defendant's publisher, Simon & Schuster, and other such persons in the commercial distribution chain of Defendant's book.

SO ORDERED:

DATE:_____

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ROYCE C. LAMBERTH
United States District Judge