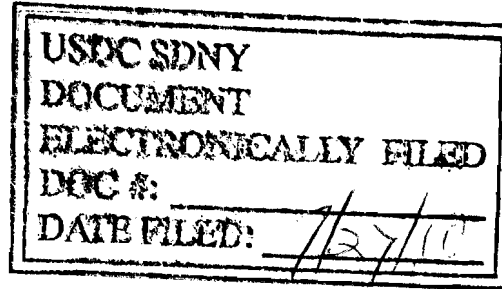


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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION

Plaintiff,

v.

GALLEON MANAGEMENT, LP, et al.

Defendants.

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No. 09-CV-8811-JSR  
ECF CASE

~~PROPOSED ORDER~~

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1. On May 18, 2010, the Court issued an order quashing, among other things, Defendant Raj Rajaratnam's request for complete forensic copies of certain computers of Defendant Roomy Khan that were in the possession of the Plaintiff Securities and Exchange Commission. In the May 18 Order the Court held that the order to quash was "without prejudice to Rajaratnam's propounding more tailored and less speculative requests in each of these categories."

2. Mr. Rajaratnam has now submitted a more tailored request. Specifically, Mr. Rajaratnam has proposed search terms that can be used to search the forensic images. Mr.

Rajaratnam, Ms. Khan, and the SEC have agreed to the following general procedures with respect to those searches:

- a. The forensic images will be provided to a third party vendor who will conduct the searches at Mr. Rajaratnam's expense.
- b. Mr. Rajaratnam, Ms. Khan, and the SEC will agree to initial search terms that Mr. Rajaratnam will provide to the third party vendor. The third party vendor will supply Mr. Rajaratnam, Ms. Khan, and the SEC with the number of "hits" that each of the initial search terms returns. The parties may agree to then alter or revise the search terms.
- c. Mr. Rajaratnam, Ms. Khan, and the SEC will agree to final search terms that Mr. Rajaratnam will provide to the third party vendor. The documents that result from a search of the final search terms will be provided to counsel for Ms. Khan for review. To the extent that Ms. Khan does not have an objection to the production of the documents, they will be produced to Mr. Rajaratnam and to the SEC. To the extent Ms. Khan raises an objection to the documents, counsel will undertake to confer in good faith and attempt to resolve any disagreements. If disagreements remain, the parties will jointly request resolution from the Court with respect to the documents in dispute.
- d. Without additional court order, and under the general parameters discussed above, the parties will agree on specific protocols for the search.

3. The SEC's custodian of the forensic images is directed to mail unencrypted copies of the forensic images to its New York Regional Office for release to the third party vendor when reasonably practicable.

SO ORDERED.

Dated: New York, New York

July 23, 2010

A handwritten signature in black ink, appearing to read "Jed Rakoff", written over a horizontal line.

Jed S. Rakoff, U.S.D.J.