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FOR THE NORTHERN DISTRICT OF TEXAS

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Via Electronic Filing and Federal Express

October 6, 2023

Scott S. Harris
Clerk of the Court
United States Supreme Court
1 First Street, N.E.
Washington, D.C. 20543

**Re: *United States v. Rahimi*, No. 22-915: Respondent's Request to
Lodge Non-Record Materials with the Clerk under Rule 32.3**

Dear Mr. Harris:

Respondent Zackey Rahimi seeks leave to lodge the following non-record materials with the Court:

1. A copy of the Texas Supreme Court's 2012 order approving standardized protective order forms (described on pages 5 and 46 of Mr. Rahimi's brief),¹ and
2. Redacted copies of the Tarrant County final civil protective orders and orders denying contested applications for protective order described in footnotes 2, 4, and 5 of Mr. Rahimi's brief.

¹ Order Approving Revised Protective Order Forms, Misc. Docket No. 12-9078 (Tex. May 8, 2012), <https://perma.cc/BAW5-J6UT>. A few months after the Tarrant County court issued Mr. Rahimi's CPO, J.A. 1, the Texas Supreme Court approved another revision to the statewide CPO forms. See Order Approving Revised Protective Order Forms, Misc. Doc. No. 20-9062 (Tex. May 1, 2020), <https://perma.cc/Y3CK-9V5Q>. The current version can be found at Order Approving Revised Protective Order Forms, Misc. Doc. No. 23-9063 (Tex. Aug. 25, 2023), <https://perma.cc/YVJ9-PARD>.

As explained in our brief, Mr. Rahimi's protective order (J.A. 1-9) contains several features and findings that are common to most Tarrant County CPOs during this 12-month period, but which are absent from the statewide standard form. Mr. Rahimi asks to lodge physical copies with your office to make it easier for the Court to see and compare Mr. Rahimi's order to the Tarrant County CPOs and the statewide order.

These materials are public records of judicial orders and decrees. The Court "can and should take notice of the laws and judicial decisions of the several States of this Union." *Pennington v. Gibson*, 57 U.S. 65, 81 (1853). The Texas Supreme Court order approving protective order forms is available on that court's website, and the Tarrant County orders are available to anyone who sets up a remote access account with the District Clerk's office. If the Court approves this request, we will provide physical copies of the orders in their original 8½-by 11-inch format, stapled or bound at the upper left-hand corner, with consecutive pagination added at the bottom for ease of reference.

Because the Tarrant County CPOs would be submitted only to show what findings and terms appeared in each order, there is no reason to include or publicize the identities of the parties. I would therefore ask permission to redact *all* identifying information—including the names—of applicants, respondents, and any household members before lodging the materials with your office. The case numbers will remain unredacted.

Before filing this request, I conferred with counsel for Petitioner, and provided a link to unredacted electronic copies of the materials. Petitioner takes no position on the request to lodge non-record materials.

Respectfully submitted,

/s/ J. Matthew Wright

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Counsel for Respondent

cc (via e-mail and electronic filing):
Office of the Solicitor General