EXHIBIT A

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SEAN COMBS, a/k/a "Puff Daddy," a/k/a "P. Diddy," a/k/a "Diddy," a/k/a "PD," a/k/a "Love,"

Defendant.

No. 24-CR-542 (AS)

Proposed Order

WHEREAS on September 17, 2024, the above-referenced Indictment charging Sean Combs was unsealed in this District.

WHEREAS the case has generated significant media attention and the Court anticipates it may continue to do so.

IT IS HEREBY ORDERED:

- 1. Assistant United States Attorneys assigned to the above-referenced matter and staff members working under their supervision or at their direction (collectively, the "Government"), and all local and federal law enforcement agents whom the Government has provided with access to grand jury materials, shall not disclose any grand jury material in violation of Fed. R. Crim. P. 6(e). Furthermore, the Government and all local and federal law enforcement agents assigned to this case shall comply with L. Crim. R. 23.1.
- 2. The defendant, Sean Combs, all attorneys for the defendant, and any individuals working under the defendant's or the attorneys' supervision or at their direction (collectively, the "Defense") shall not disclose or cause the disclosure of any non-public information, including

information produced pursuant to the Protective Order entered in this case (Dkt. 26). Furthermore, the Defense shall comply with Local Rule 23.1.

3. Nothing in this order supersedes or overrides the obligations set forth in the Protective Order entered in this case (Dkt. No. 26).

SO ORDERED.

Dated: October ___, 2024

Hon. Arun Subramanian United States District Judge Southern District of New York