BENJAMIN B. WAGNER
United States Attorney
STANLEY A. BOONE
KIRK E. SHERRIFF
Assistant U.S. Attorneys
2500 Tulare Street, Suite 4401
Fresno, California 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for the
United States of America

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. SNEHA RAMESH MOHAMMADI, Defendant.	CASE NO.: 1:11-CR-00026 LJO STIPULATION AND PROTECTIVE ORDER BETWEEN THE UNITED STATES AND NAMED DEFENDANTS

WHEREAS, the discovery in this case is voluminous and contains a large amount of protected personal information including but not limited to Social Security numbers, dates of birth, driver's license numbers, bank account numbers, telephone numbers, and residential addresses ("Protected Information"); and

WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the unauthorized disclosure or dissemination of this information to anyone not a party to the court proceedings in this matter;

The parties agree that entry of a stipulated protective order is

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

appropriate.

THEREFORE, defendant Sneha Ramesh Mohammadi, by and through her counsel of record ("Defense Counsel"), and plaintiff the United States of America, by and through its counsel of record, hereby agree and stipulate as follows:

1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, and its general supervisory authority.

2. This Order pertains to all discovery provided to or made available to Defense Counsel as part of discovery in this case (hereafter, collectively known as "the discovery").

3. By signing this Stipulation and Protective Order, Defense Counsel agree not to share any documents that contain Protected Information with anyone other than Defense Counsel and designated defense investigators and support staff. Defense Counsel may permit each defendant to view unredacted documents in the presence of his attorney, defense investigators, and support staff. The parties agree that Defense Counsel, defense investigators, and support staff shall not allow the defendants to copy Protected Information contained in the discovery. The parties agree that Defense Counsel, defense investigators, and support staff may provide the defendants with copies of documents from which Protected Information has been redacted.

4. The discovery and information therein may be used only in connection with the litigation of this case and for no other purpose. The discovery is now and will forever remain the property of the United States Government. Defense Counsel will return the discovery to the Government or certify that it has been shredded at the

conclusion of the case.

5. Defense Counsel will store the discovery in a secure place and will use reasonable care to ensure that it is not disclosed to third persons in violation of this agreement.

6. Defense Counsel shall be responsible for advising his respective defendant, employees, and other members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

7. In the event that a defendant substitutes counsel, undersigned Defense Counsel agrees to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this Order.

IT IS SO STIPULATED.

DATED: 4/26/11

By: /s/ Carl M. Faller
CARL M. FALLER
Attorney for Defendant
SNEHA RAMESH MOHAMMADI

DATED: 4/29/11

BENJAMIN B. WAGNER
United States Attorney

By: /s/ Stanley A. Boone
STANLEY A. BOONE
KIRK E. SHERRIFF
Assistant U.S. Attorney

IT IS SO ORDERED.

Dated: May 2, 2011

/s/ Lawrence J. O'Neill
UNITED STATES DISTRICT JUDGE