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. DAVID MARSHALL CRISP, CARLYLE LEE COLE, JULIE DIANNE FARMER, SNEHA RAMESH MOHAMMADI, JAYSON PETER COSTA, JERIEL SALINAS, MICHAEL ANGELO MUNOZ, JENNIFER ANNE CRISP, and CALEB LEE COLE, Defendants.	CASE NO.: 1:11-CR-00026 LJO STIPULATION AND PROTECTIVE ORDER BETWEEN THE UNITED STATES AND COORDINATING DISCOVERY ATTORNEY SHAZZIE NASEEM

WHEREAS, the Court has appointed Shazzie Naseem as a Coordinating Discovery Attorney in this case; and

WHEREAS, the discovery in this case has been produced and/or made available to defense counsel subject to the terms of stipulated Protective Orders, as the discovery contains a large amount of

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

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 the parties desired 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; and

WHEREAS the United States and Coordinating Discovery Attorney Shazzie Naseem ("Coordinating Discovery Attorney") agree that it is appropriate to confirm that unredacted discovery provided to the Coordinating Discovery Attorney is and will be subject to the terms of this stipulated protective order.

THEREFORE, plaintiff the United States of America, by and through its counsel of record, and Coordinating Discovery Attorney Shazzie Naseem 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 in this case provided to or made available to the Coordinating Discovery Attorney (hereafter, collectively known as "the discovery").

3. By signing this Stipulation and Protective Order, the Coordinating Discovery Attorney agrees not to share, or communicate the contents therein, of any documents that contain Protected Information with anyone other than support staff and other counsel in the Coordinating Discovery Attorney's office, defense counsel in this case (each of whom has separately entered into a stipulated protective order regarding discovery), and any outside consultant

retained in this matter to assist the Coordinating Discovery Attorney. The Coordinating Discovery Attorney shall ensure that each such outside consultant agrees in writing to be bound by the terms of this Stipulation and Protective Order prior to being provided access to the discovery in this case.

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

5. The Coordinating Discovery Attorney 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. The Coordinating Discovery Attorney shall be responsible for advising his staff, other counsel in the Coordinating Discovery Attorney's Office, and any outside consultant retained to assist the Coordinating Discovery Attorney in this matter, of the contents of this Stipulation and Protective Order.

IT IS SO STIPULATED.

DATED: Sept. 24, 2012

By: /s/ Shazzie Naseem
SHAZZIE NASEEM
Coordinating Discovery Attorney

DATED: Sept. 25, 2012

BENJAMIN B. WAGNER
United States Attorney

By: /s/ Kirk E. Sherriff
STANLEY A. BOONE
KIRK E. SHERRIFF
Assistant U.S. Attorney

ORDER

IT IS SO ORDERED.

Dated: September 25, 2012

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