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8 UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) Case No.: 1:12-cr-00083 AWI/DLB  
11 )  
Plaintiff, )  
12 )  
v. ) STIPULATION BETWEEN THE UNITED  
13 ) STATES AND DEFENDANT REGARDING  
PRODUCTION OF PROTECTED  
14 ) INFORMATION; PROTECTIVE ORDER  
RE: SAME  
15 DANIEL OLUWA SESAN LEITCH, )  
16 Defendant. )  
\_\_\_\_\_ )

17  
18 WHEREAS, the discovery in this case is voluminous and  
19 contains a large amount of private personal information regarding  
20 third parties and victims (both adults and minors), including but  
21 not limited to their names, dates of birth, medical records,  
22 Social Security numbers, telephone numbers, and residential  
23 addresses ("Protected Information"); and

24 WHEREAS, the parties desire to avoid both the necessity of  
25 large scale redactions and the unauthorized disclosure or  
26 dissemination of this information to anyone not a party to the  
27 court proceedings in this matter;  
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Stipulation Between the United States and Defendant Regarding Production of Protected  
Information; Protective Order Re: Same

1 The parties agree that entry of a stipulated protective  
2 order is appropriate.

3 THEREFORE, defendant DANIEL OLUWA SESAN LEITCH, by and  
4 through his counsel of record ("Defense Counsel"), and the United  
5 States of America, by and through Assistant United States  
6 Attorney Stanley A. Boone, hereby agree and stipulate as follows:

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

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

13 3. By signing this Stipulation and Protective Order,  
14 Defense Counsel agrees not to share any documents that contain  
15 Protected Information with anyone other than Defense Counsel  
16 attorneys, designated defense investigators, and support staff.  
17 Defense Counsel may permit the defendant to view unredacted  
18 documents in the presence of his attorneys, defense  
19 investigators, and support staff. The parties agree that Defense  
20 Counsel, defense investigators, and support staff shall not allow  
21 the defendant to copy Protected Information contained in the  
22 discovery. The parties agree that Defense Counsel, defense  
23 investigators, and support staff may provide the Defendant with  
24 copies of documents from which Protected Information has been  
25 redacted.

26 4. The discovery and information therein may be used only  
27 in connection with the litigation of this case and for no other  
28 purpose. The discovery is now and will forever remain the

property of the United States of America ("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 the 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 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.

BENJAMIN B. WAGNER  
United States Attorney

DATED: 4/9/2012


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

DATED: 4/5/2012

By: /s/ Dale A. Blickenstaff  
DALE A. BLICKENSTAFF  
Attorney for Defendant  
DANIEL OLUWA SESAN LEITCH

IT IS SO ORDERED.

Dated: April 9, 2012

  
CHIEF UNITED STATES DISTRICT JUDGE