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7 Attorney for Defendant,  
8 HENRY WILLIAM STANLEY JR.

9 UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA, )  
12 Plaintiff, )  
13 vs. )  
14 HENRY WILLIAM STANLEY JR., )  
15 Defendant. )

) CASE NO. 2:13-CR-00198-KJM  
)  
) AMENDED STIPULATION AND ORDER  
) FOR PROTECTIVE ORDER REGARDING  
) DEFENSE FORENSIC COMPUTER  
) EXAMINATION

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18 THE PARTIES STIPULATE, through their respective counsel, Michelle Rodriguez,  
19 Assistant United States Attorney, and Mark W. Girdner, Attorney for Defendant Mr. Stanley, to  
20 the following proposed protective order governing the defense expert’s forensic examination of  
21 computer data seized in this case.

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23 In order to advise the defendant adequately, the defense case requires a forensic  
24 evaluation by defendant’s proposed expert, Attorney Mark W. Girdner, Marcus Lawson, or one  
25 of Mr. Lawson’s identified colleagues and at Global CompuSearch LLC, and other material the  
26 government alleges to contain images of child pornography at the Sacramento High Tech Task  
27 Force offices in Sacramento.  
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2 The parties have agreed that the attached proposed order should govern the defense  
3 examination of the computer media. They ask the Court to approve the proposed order.  
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7 Respectfully Submitted,

8 Dated: September 30, 2013

/s/ Mark W. Girdner  
Mark W. Girdner  
Attorney for Defendant,  
Henry William Stanley, Jr.

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10  
11 Dated: September 30, 2013

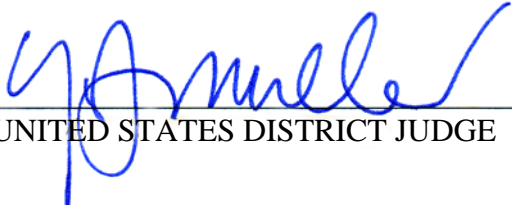
/s/ Michelle Rodriguez  
Michelle Rodriguez  
Attorney for Plaintiff

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14 **ORDER**

15 Pursuant to the parties' agreement, the Court approves the attached protective order.  
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18 IT IS SO ORDERED.

19 Dated: October 2, 2013

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22 UNITED STATES DISTRICT JUDGE  
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FOR PROTECTIVE ORDER REGARDING  
DEFENSE FORENSIC COMPUTER  
EXAMINATION

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19 **ORDER**

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21 IT IS HEREBY ORDERD AS FOLLOWS:

- 22 1. The United States Department of Homeland Security, Immigration and Customs  
23 Enforcement agents shall make a duplicate copy of the hard drive and any other storage media  
24 available for the defense attorney analysis.  
25  
26 2. The duplicate copies of the hard drive and storage media shall be made available for  
27 defense counsel, Mark W. Girdner, or another member of the defense team, and to the  
28 defendant’s expert, to review at the Sacramento High Tech Force offices in Sacramento for the

1 purpose of preparing the defense of the above-entitled action. The images on the hard drive and  
2 storage media shall be viewed by another person on behalf of the defense.

3  
4 3. A private room will be provided for the defense examination. No government agents will  
5 be inside the room during the examination.

6 4. The attorney will be permitted to bring whatever equipment, books, or recording he  
7 believes may be necessary to conduct the examination.

8 5. Neither the defense expert nor the defense attorneys nor any associate shall remove the  
9 hard drive or other storage media from the confines of the law enforcement office.

10  
11 6. With the exception of materials which would be considered child pornography under  
12 federal law (including visual depictions and data capable of conversion into a visual depiction),  
13 the expert may download and remove files or portions of files, provided the forensic integrity of  
14 the hard drive is not altered. The expert, or attorney will certify in writing (using the attached  
15 certification), that he has taken no materials which would be considered child pornography, or  
16 data capable of being converted into child pornography, under federal law, and that he has not  
17 caused any child pornography to be sent from the law enforcement premises by any means  
18 including by any electronic transfer files.

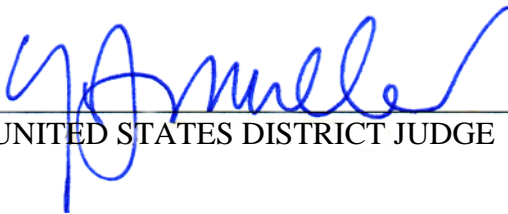
19  
20 7. Except when a defense expert fails to provide this certification, no Government agent, or  
21 any person connected with the Government, will examine or acquire in any fashion any of the  
22 items used by the expert in order to conduct the defense analysis. Should a defense expert fail to  
23 certify that the expert has not copied or removed child pornography, or data capable of being  
24 converted into child pornography, Government agents may then inspect or examine the materials  
25 in order to ensure that prohibited child pornography has not been removed.  
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1 8. When defense indicates that it is finished with its review of the copy of the hard drives,  
2 the drive(s) or other storage devices shall be “wiped” clean.

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4 9. Any disputes regarding the implementation of this order shall be brought to the attention  
5 of the court through representative counsel after first consulting opposing counsel.

6 IT IS SO ORDERED.

7 Dated: October 2, 2013.

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11 UNITED STATES DISTRICT JUDGE  
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CASE NO. 2:13-CR-00198-KJM  
STIPULATION AND [PROPOSED ORDER]  
FOR PROTECTIVE ORDER REGARDING  
DEFENSE FORENSIC COMPUTER  
EXAMINATION

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19 CERTIFICATION

20 I, \_\_\_\_\_, certify under penalty of perjury that I have not copied  
21 or removed any images of child pornography or data capable of being converted into images of  
22 child pornography, or caused the same to be transferred electronically (or by any other means) to  
23 any other location, during the course of review of the evidence in this case.  
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26  
27 Date: \_\_\_\_\_