BENJAMIN B. WAGNER
United States Attorney
MICHAEL D. ANDERSON
CHRISTOPHER S. HALES
Assistant United States Attorneys
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. JAMAL SHEHADEH, SABER SHEHADEH, and BRIAN STONE, Defendants.	CASE NO. 2:16-CR-0038 MCE STIPULATION AND PROTECTIVE ORDER BETWEEN THE PARTIES REGARDING DISCOVERY

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants JAMAL SHEHADEH, SABER SHEHADEH, and BRIAN STONE, by and through their counsel of record, hereby 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 Stipulation and 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. Defense counsel shall not disclose any of the discovery to any person other than their respective defendant/client, witnesses that they are interviewing or preparing for trial, or attorneys,

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law clerks, paralegals, secretaries, experts, and investigators involved in the representation of the defendant in connection to this criminal case.

4. The discovery and information therein may only be used 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 or certify that it has been shredded at the conclusion of the case and defense counsel's document retention obligations.

5. In the event that the defendant obtains substitute counsel, undersigned defense counsel agrees to return all discovery provided under this order to government counsel, in order that the government may arrange for substituted counsel to sign the order and the reissuance of the discovery to new counsel.

6. 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.

7. If defense counsel makes, or causes to be made, any further copies of any of the discovery, defense counsel will inscribe the following notation on each copy or incorporate onto electronic files (efiles): "U.S. Government Property; May Not Be Disseminated Without U.S. Government Permission." Efiles shall be encrypted.

8. If defense counsel releases custody of any of the discovery, or authorized copies thereof, to any person described in paragraph three, defense counsel shall provide such recipients with copies of this Order and advise that person that the discovery is the property of the United States Government, that the discovery and information therein may only be used in connection with the litigation of this case and for no other purpose, and that an unauthorized use of the discovery may constitute a violation of law and/or contempt of court. Defense counsel will not release custody of reports of witness statements, search warrant affidavits, ex parte tax order affidavits, and tax records to any defendant or any other person who is not employed by defense counsel.

9. Defense counsel shall advise government counsel of any subpoenas, document requests or claims for access to the discovery by third parties in order that the government may take action to resist or comply with such demands as it may deem appropriate.

10. Defense counsel shall be responsible for advising his or her respective defendant, employees and other members of the defense team, and defense witnesses of the contents of this Stipulation/Order. Defense counsel shall not provide or make available to any person described in paragraph three the discovery until that individual agrees in writing to be bound by the contents of this Stipulation/Order.

11. Nothing in this stipulation and order shall preclude a party from seeking a more restrictive protective order or other court order with regard to particular discovery items.

IT IS SO STIPULATED.

DATED: March 25, 2016

BENJAMIN B. WAGNER
United States Attorney

By: /s/ Michael D. Anderson
MICHAEL D. ANDERSON
Assistant United States Attorney

/s/ Christopher S. Hales
CHRISTOPHER S. HALES
Assistant United States Attorney

DATED: March 25, 2016

/s/ Matt Bockmon
MATT BOCKMON
Counsel for Defendant JAMAL SHEHADEH

/s/ Todd Leras
TODD LERAS
Counsel for Defendant SABER SHEHADEH

/s/ John Manning
JOHN MANNING
Counsel for Defendant BRIAN STONE

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O R D E R

IT IS SO FOUND AND ORDERED.

Dated: March 25, 2016

KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE