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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. RICKY LEE RICHARDSON JR., Defendant.	CASE NO. 2:16-CR-0069 TLN STIPULATION AND [PROPOSED] PROTECTIVE ORDER REGARDING DISSEMINATION OF DISCOVERY MATERIALS

Pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3509(d)(3), the United States of America, by and through Assistant United States Attorney Brian A. Fogerty, and defendant Ricky Lee Richardson, Jr., by and through Assistant Federal Defender Noa E. Oren, hereby stipulate and agree, and respectfully request that the Court order that:

1. The United States shall produce discovery containing personal identifying information of third parties subject to this stipulation and associated protective order.

2. Certain materials that the government intends to produce in discovery contain names and personal identifying information of the defendant and other individuals, including a minor victim (hereinafter, the "Protected Material"). Personal identifying information includes, but is not limited to, surnames, street addresses, telephone numbers, drivers' license numbers, social security numbers, financial account numbers, dates of birth, and any other alphanumeric identifiers attributed to any

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person. The unauthorized disclosure of information identifying any minor victim in this case would have a detrimental effect on that victim. The disclosure of any material produced in discovery that identifies a minor victim and/or contains personal identifying information is governed by this order.

3. The Protected Material is now and will forever remain the property of the United States. The Protected Material is entrusted to counsel for the defendant only for purposes of representation in this case. Counsel for the defendant may retain a copy of the Protected Material.

4. Counsel for the defendant shall not give Protected Material or any copy of Protected Material to any person other than counsel's staff, investigator, or retained expert(s). The terms "staff," "investigator," and "expert" shall not be construed to describe the defendant or other person not either regularly employed by counsel or a licensed investigator or expert hired in this case.

5. Any person receiving Protected Material or a copy of Protected Material from counsel for the defendant shall be bound by the same obligations as counsel and further may not give the Protected Material to anyone (except that the Protected Material shall be returned to counsel).

6. Counsel shall maintain a list of persons to whom any Protected Material, or copies thereof, have been given. Such persons shall be shown a copy of this Stipulation and Order and shall sign a copy of the Stipulation and Order and note that they understand its terms and agree to them.

7. The defendant in this case may review the Protected Material and be aware of its contents, but shall not be given control of the Protected Material or any copies thereof. Notwithstanding the foregoing, counsel is permitted to provide defendant with copies of documents otherwise classifiable as Protected Material so long as counsel completely redact all personal identifying information from those documents prior to providing them to the defendant.

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8. The foregoing notwithstanding, after the trial confirmation hearing in this case, counsel, staff, and investigator for the defendant who has confirmed for trial may make copies of the Protected Material for trial preparation and presentation. Any copies must, however, remain in the possession of counsel, staff, investigator, expert, or the Court.

Dated: April 8, 2016

BENJAMIN B. WAGNER
United States Attorney

By: /s/ BRIAN A. FOGERTY
BRIAN A. FOGERTY
Assistant United States Attorney

Dated: April 8, 2016

/s/ NOA E. OREN (authorized by email)
NOA E. OREN
Assistant Federal Defender
Counsel for Defendant

ORDER

By agreement of the parties, and good cause appearing, IT IS SO ORDERED.

Dated: April 11, 2016

CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE