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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICHARD AYVAZYAN,
aka "Richard Avazian" and "Iuliia Zhadko,"
MARIETTA TERABELIAN,
aka "Marietta Abelian" and "Viktoria Kauichko,"
ARTUR AYVAZYAN,
aka "Arthur Ayvazyan," and
TAMARA DADYAN,
MANUK GRIGORYAN,
aka "Mike Grigoryan," and "Anton Kudiumov,"
ARMAN HAYRAPETYAN,
EDVARD PARONYAN,
aka "Edvard Paronian" and "Edward Paronyan," and
VAHE DADYAN,

Defendants.

No. CR 20-579(A)-SVW

[PROPOSED] ORDER GRANTING STIPULATION FOR ORDER PURSUANT TO FED. R. 502(D)

The Court has read and considered the Stipulation for Order Pursuant to Fed. R. 502(D) filed by the parties in this matter on June 9, 2021. The Court understands that the parties have identified a method of searching and reviewing material that the Filter Team has identified as potentially privileged ("Filter Material"). This material has been identified as belonging to Defendants R. AYVAZYAN, TERABELIAN, A. AYVAZYAN, and/or T. DADYAN. The court understands that the Filter Team has withheld the material from the Prosecution Team and from Defendants GRIGORYAN, HAYRAPETYAN, PARONYAN, and VAHE DADYAN. The Court also understands that the defense is concerned that using this approach may result in the inadvertent production of privileged material, and that no party is waiving any privilege it holds. Therefore, good cause appearing:

1. The production of potentially privileged material dated prior to October 19, 2020, by the Filter Team to Defendants GRIGORYAN, HAYRAPETYAN, PARONYAN, and VAHE DADYAN does not result in a waiver of any party's privileges. Such material shall not be transmitted by the Filter Team to the Prosecution Team, nor by the Filter Team or Co-Defendants to any third parties.

2. The Filter Team will not produce potentially privileged material dated on or after October 19, 2020 to Defendants GRIGORYAN, HAYRAPETYAN, PARONYAN, and VAHE DADYAN.

3. The Filter Team will not produce any potentially privileged material to the Prosecution Team.

4. The use of the potentially privileged material by any parties other than the potential privilege holder is limited to the instant case, barring any subsequent determination that the material is not privileged.

5. Nothing in this Order limits the right of any party, including the Filter Team, to petition the Court for an *in camera* review of the Potentially Protected Information.

IT IS SO ORDERED.

Dated: June__, 2021

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Hon. Stephen V. Wilson

United States District Judge