

ERIC GRANT
United States Attorney
AUDREY B. HEMESATH
MATTHEW THUESEN
Assistant United States Attorneys
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KARLA MONTOYA,

Defendant.

CASE NO. 2:23-CR-320 TLN
STIPULATION AND [~~PROPOSED~~] PROTECTIVE
ORDER

WHEREAS, the parties desire to prevent the unauthorized disclosure or dissemination of certain sensitive but unclassified discovery materials to anyone not a party to the court proceedings in this case as provided below;

WHEREAS, the sensitive but unclassified discovery materials at issue include information pertaining to witnesses or potential witnesses in this case, specifically personal identifying information, bank account information, and residence information;

WHEREAS, such sensitive but unclassified discovery materials shall be identified as sensitive and subject to a protective order at the time of disclosure, whether on the documents themselves or in an accompanying cover letter;

WHEREAS, the parties agree that entry of a stipulated protective order is appropriate, and that a private agreement is not appropriate in light of the nature of the information at issue and the charges in this case; and

1 WHEREAS, the defendant, KARLA MONTROYA, has new counsel (“Defense Counsel”) who
2 wishes the opportunity to review the discovery;

3 Defendant and plaintiff United States of America, by and through their undersigned counsel of
4 record, hereby agree and stipulate as follows:

5 1. This Court may enter protective orders pursuant to Rule 16(d) of the Federal Rules of
6 Criminal Procedure, its general supervisory authority, and Local Rule 141.1.

7 2. This Order pertains to all discovery provided to or made available to Defense Counsel
8 that is identified as sensitive and subject to a protective order in this case (hereafter, collectively known
9 as “the protected discovery”).

10 3. Defense Counsel shall not disclose any of the protected discovery to any person other
11 than the defendant, or attorneys, law clerks, paralegals, secretaries, experts, interpreters, and
12 investigators, involved in the representation of his client (“the Defense Team”).

13 4. The Defense Team may show witnesses who are not a part of the Defense Team the
14 protected discovery in the course of preparing a defense for trial or any related proceedings in this case,
15 but only if (i) the witness, by reason of their participation in the underlying events or conduct, would
16 have seen or had reason to know such discovery, or (ii) it is otherwise relevant to the defense of the case
17 that the Defense Team discuss with or show the witness the protected discovery. Witnesses may only
18 view the protected discovery in the presence of the Defense Team. No witness or potential witness may
19 retain copies of the protected discovery after his or her review of those materials with the Defense Team
20 is complete.

21 5. The protected discovery and information therein may only be used in connection with the
22 litigation of this criminal case and for no other purpose. The protected discovery may not be shared or
23 discussed with counsel in any other matters such as civil litigation, except civil litigators who are a part
24 of the Defense Team. The protected discovery will not be used or introduced, however, in any civil
25 litigation. The protected discovery is now and will forever remain the property of the United States
26 Government.

27 6. Defense Counsel, and the Defendant if she retains any copy of any material, will store the
28 discovery in a secure place and will use reasonable care to ensure that it is not disclosed to third persons

1 in violation of this agreement.

2 7. If Defense Counsel releases custody of any of the protected discovery, or authorized
3 copies thereof, to any person described in paragraph (3), Defense Counsel shall provide such recipients
4 with copies of this Order and advise that person that the protected discovery is the property of the United
5 States Government, that the protected discovery and information therein may only be used in connection
6 with the litigation of this case and for no other purpose, and that an unauthorized use of the protected
7 discovery may constitute a violation of law and/or contempt of court.

8 8. In the event that the defendant obtains substitute counsel, undersigned Defense Counsel
9 agree to withhold the protected discovery from new counsel unless and until substituted counsel agrees
10 to be bound by this Order.

11 9. Defense Counsel shall be responsible for advising their client, employees, and other
12 members of the defense team of the contents of this Stipulation/Order.

13 10. While this Order applies to any copies made of any materials covered by this Order, it
14 does not apply to any materials that the Defendant or the Defense Team may have or gain access to via
15 independent means, even if copies or duplicates of those materials may be covered by this Order.

16 11. This stipulation is without prejudice to either party applying to the Court to modify the
17 terms of any protective order. This Court shall retain jurisdiction to modify this Order upon motion of
18 either party even after the conclusion of district court proceedings in this case.

19 IT IS SO STIPULATED.
20
21
22
23
24
25
26
27
28

1 Dated: May 21, 2026

Respectfully submitted,

2 ERIC GRANT
3 United States Attorney

4 By: /s/ MATTHEW THUESEN
5 MATTHEW THUESEN
6 Assistant United States Attorney

7
8 Dated: May 21, 2026

9 By: /s/ JAI M. GOHEL
10 JAI M. GOHEL
11 Counsel for KARLA
12 MONTOYA

13 **ORDER**

14 IT IS SO FOUND AND ORDERED.

15 DATED: May 26, 2026

16
17 
18 SEAN C. RIORDAN
19 UNITED STATES MAGISTRATE JUDGE
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28