RANDY S. GROSSMAN
Acting United States Attorney
ANDREW J. GALVIN
Cal Bar No. 261925
Assistant U.S. Attorney
Federal Office Building
880 Front Street, Room 6293
San Diego, California 92101-8893
Tel: (619) 546-9721

**UNITED STATES DISTRICT COURT**

**SOUTHERN DISTRICT OF CALIFORNIA**

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| UNITED STATES OF AMERICA,<br><br>Plaintiff,<br><br>v.<br><br>DENNY BHAKTA<br><br>Defendant. | Case No. 21-CR-3352-JLS<br><br>**JOINT MOTION FOR PROTECTIVE ORDER** |

The parties, Plaintiff United States of America, by and through its counsel Randy S. Grossman, Acting United States Attorney, and Andrew J. Galvin, Assistant United States Attorney, and Defendant Denny Bhakta, by and through his counsel, Sandra Resnick, hereby jointly move the Court, pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, to enter a protective order pertaining to pretrial discovery. The parties seek a protective order to prevent unnecessary disclosure of personally identifiable information and disclosure to certain unrelated third parties. Accordingly, the parties jointly agree to the following:

1. Any discoverable documents that were filed under seal are unsealed for the limited purpose of allowing the United States to provide them to the defendant and defense counsel ("the defense") in discovery.

2. All discovery produced by the United States in this case is for use by the defense solely for purposes of these proceedings, including investigating, preparing for trial, trial, and any appeals of this matter, and for no other purpose.

3. The defense may not distribute, disseminate, disclose, or exhibit discovery materials to any person who is not a part of the defense, except as further set forth herein.

4. The defense shall take all reasonable steps to: (a) maintain the confidentiality of the discovery, and (b) safeguard the discovery produced in this case.

5. The defense may show witnesses not part of the defense, and their attorneys, discovery materials as necessary for the preparation of the defense but may not give copies or the materials to witnesses absent further order of the Court pursuant to an ex parte application by Defendant.

6. To the extent that any of the criminal discovery materials contain any individual's personal information within the meaning of General Order No. 514 of the United States District Court for the Southern District of California ("General Order No. 514"), the parties shall redact any filings referencing or containing said materials in a manner consistent with General Order No. 514.

7. The defense shall return to the United States or destroy all copies of the discovery within 90 days of the conclusion of the proceedings in the above-referenced case, including any appeal.

8. To the extent that any criminal discovery materials were filed with the court under seal, the defense shall file a motion to unseal the documents with notice to the United States before any pleadings or exhibits referencing or containing said materials may be publicly filed.

9. If defense counsel withdraws or is disqualified from participation in this case, the defense shall return to the United States or destroy any discovery produced pursuant to this order within 10 days.

10. Each counsel of record shall ensure that every member of his/her team is advised of this order and agrees to be bound by its terms.

DATED: December 21, 2021

Respectfully Submitted,

RANDY S. GROSSMAN
Acting United States Attorney

*/s/ Andrew J. Galvin*
ANDREW J. GALVIN
Assistant United States Attorney

DATED: December 21, 2021

*/s/ Sandra Resnick*
SANDRA RESNICK
Attorney for Defendant
DENNY BHAKTA