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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHOLANDA THOMAS (aka "Astro" or "Stro"),

Defendant.

CASE NO. 1:20-CR-00253-DAD-BAM

**STIPULATION BETWEEN THE PARTIES
REGARDING PROTECTED INFORMATION**

WHEREAS, the discovery in this case contains a large amount of personal information including but not limited to Social Security numbers, dates of birth, bank accounts, residential addresses and other personal information ("Protected Information"); and

WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the unauthorized disclosure or dissemination of this information to anyone not a party to the court proceedings in this matter;

The parties agree that entry of a stipulated protective order is appropriate.

THEREFORE, defendant SHOLANDA THOMAS, by and through her counsel of record ("Defense Counsel"), and plaintiff the UNITED STATES, by and through its counsel of record, hereby agree and stipulate as follows:

1 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
2 Criminal Procedure, and its general supervisory authority.

3 2. This Order pertains to all discovery provided to or made available to Defense Counsel as
4 part of discovery in this case (hereafter, collectively known as “the discovery”).

5 3. By signing this Stipulation, Defense Counsel agrees not to share any documents that
6 contain Protected Information with anyone other than Defense Counsel and designated defense
7 investigators and support staff. Defense Counsel may permit the defendant to view unredacted
8 documents in the presence of her attorney, defense investigators, and support staff. The parties agree
9 that Defense Counsel, defense investigators, and support staff shall not allow the defendant to copy
10 Protected Information contained in the discovery. The parties agree that Defense Counsel, defense
11 investigators, and support staff may provide the defendant with copies of documents from which
12 Protected Information has been redacted.

13 4. The discovery and information therein may be used only in connection with the litigation
14 of this case and for no other purpose. The discovery is now and will forever remain the property of the
15 Government. Defense Counsel will return the discovery to the Government or certify that it has been
16 destroyed at the conclusion of the case.

17 5. Defense Counsel will store the discovery in a secure place and will use reasonable care to
18 ensure that it is not disclosed to third persons in violation of this agreement.

19 6. Defense Counsel shall be responsible for advising the defendant, as well as Defense
20 Counsel’s employees, other members of the defense team, and defense witnesses, of the contents of this
21 Stipulation and Order.

22 7. In the event that the defendant substitutes counsel, undersigned Defense Counsel agrees
23 to withhold discovery from any new counsel unless and until substituted counsel agrees also to be bound
24 by this Stipulation and Order.

25 ///

26 ///

27 ///

1 IT IS SO STIPULATED.

2
3 DATED: September 27, 2021

4
5 /s/ Melissa Baloian
6 MELISSA BALOIAN
7 COUNSEL FOR SHOLANDA THOMAS

8
9 /s/ Joseph Barton
10 JOSEPH BARTON
11 COUNSEL FOR UNITED STATES

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**PROTECTIVE ORDER BETWEEN THE
PARTIES REGARDING PROTECTED
INFORMATION**

ORDER

For good cause shown, the stipulation between counsel dated September 27, 2021, in Case No. 1:20-CR-00253-DAD-BAM as to SHOLANDA THOMAS, regarding discovery and treatment of Protected Information is approved. IT IS SO ORDERED.

IT IS SO ORDERED.

Dated: September 27, 2021

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE