UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff, Criminal No. 25-cr-20543

v. Hon. Judith E. Levy

D-1 CEMHAN "JIMMY" BIRICIK,
D-2 MARTIN PERLIN, M.D.

Defendants.
_____/

STIPULATED PROTECTIVE ORDER

The parties, by and through their undersigned counsel, stipulate and agree as follows.

1. The government will produce discovery in this matter that includes (i) confidential law enforcement materials (including but not limited to confidential source information); (ii) the personal identifying information of third parties and confidential health information of those individuals ("PII"), which may include, but is not limited to, social security numbers, dates of birth, telephone numbers, addresses; (iii) financial information (such as account numbers); (iv) proprietary business information; and (v) personal health and medical records.

2. The voluminous amount of discovery in this matter makes the redaction of PII impractical prior to production as discovery. The parties understand that such PII

and the confidential law enforcement materials, as contained in the discovery, should be protected from use and disclosure beyond what is reasonably necessary for the effective defense of this matter.

3. Therefore, the parties respectfully request that the Court enter this Stipulated Protective Order ("Order") pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure. This Order pertains to all discovery provided to or made available to defense counsel as part of discovery in this matter.

4. By signing the Order, defense counsel agrees that any documents or files containing confidential law enforcement materials or PII are to be viewed only by defense counsel, designated defense investigators, support staff, or other individuals necessary for assisting defense in the preparation and trial for this matter. Defense counsel may permit their client to view confidential materials or unredacted PII files only in the presence of their attorney, defense investigators, and/or support staff in the office of defense counsel or at the detention facility where the defendant is being housed. However, confidential materials or unredacted PII files may not be disseminated to, or by, the defendant or between defendants, or any other person, in any circumstance.

5. The defendant shall not be permitted to keep or take with the defendant confidential law enforcement materials, unredacted copies of files containing PII, or possess notes containing PII obtained from such files. All defendants shall be

permitted to keep and review redacted copies of documents with PII removed and possess notes not containing PII or confidential law enforcement information.

6. The parties agree that no individuals outside of those listed above are to review, receive and/or otherwise view any discovery materials in this case.

7. The discovery and information therein may only be used in connection with the litigation of this case and for no other purpose. The discovery is now and will forever remain the property of the United States Government.

8. Defense counsel shall return the electronic discovery to the government at the conclusion of this case and/or permanently delete any copies from their computer systems. If any defense counsel, defense investigator, or support staff has produced any electronic discovery, the electronic discovery shall be deleted or returned to the government. If any defense counsel, defense investigator, or support staff has produced hard copies of the discovery, the hard copies shall be shredded. Within 90 days following the conclusion of all litigation in this matter (including time for any appeals), defense counsel shall certify in writing to counsel for the United States that all of the discovery has been returned, destroyed, and/or shredded.

9. In the event the defense seeks utilization of the discovery material in any court filing, at trial or in another hearing in this matter, any PII must be redacted from the discovery prior to its use. Any filings shall comply with Rule 49.1 of the Federal Rules of Criminal Procedure and the electronic filing policies and procedures of the

United States District Court for the Eastern District of Michigan.

10. Defense counsel shall be responsible for advising their client, defense investigators, support staff, and other members of the defense team of the contents of this Order and shall instruct such persons that disclosure of the discovery material beyond that allowed by this Order is prohibited. Any unauthorized disclosure may constitute a violation of this Order.

11. In the event that the defendant substitutes counsel, undersigned defense counsel agrees to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this Order.

IT IS SO STIPULATED.

Dated: September 10, 2025

JEROME F. GORGON JR.
United States Attorney

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IT IS SO ORDERED.

Date: September 13, 2025

s/Judith E. Levy
JUDITH E. LEVY
United States District Judge