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IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. CECILIA NAVIL AQUINO, Defendant.	CASE NO. 1:21-CR-00144-NONE-SKO **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 CECILIA NAVIL AQUINO, 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. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, and its general supervisory authority.

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

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

4. The discovery and information therein may be used only 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 Government. Defense Counsel will return the discovery to the Government or certify that it has been destroyed at the conclusion of the case.

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

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

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

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IT IS SO STIPULATED.

DATED: June 2, 2021

/s/ Robert Lamanuzzi
ROBERT LAMANUZZI
COUNSEL FOR CECILIA AQUINO

/s/ Joseph Barton
JOSEPH BARTON
COUNSEL FOR UNITED STATES

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IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. CECILIA NAVIL AQUINO, Defendant.	CASE NO. 1:21-CR-00144-NONE-SKO **PROTECTIVE ORDER BETWEEN THE PARTIES REGARDING PROTECTED INFORMATION**

ORDER

For good cause shown, the stipulation between counsel dated June 2, 2021, in Case No. 1:21-cr-00144-NONE-SKO, regarding discovery and treatment of Protected Information is approved.

IT IS SO ORDERED.

DATED: June 2, 2021

Sheila K. Oberto
SHEILA K. OBERTO
UNITED STATES MAGISTRATE JUDGE