UNITED STATES OF AMERICA,

Plaintiff,

\$548,937.00 IN U.S. CURRENCY,

Defendant.

ISMATULLA NOORY AND LINA NOORY,

Claimants.

5

6 7

8

10

11 12

1.3

14

15 16

17

18

19 20

21

22 23

24

25 26

27

28

FILED - SOUTHERN DIVISION CLERK, U.S. DISTRICT COURT SEP 2 3 2013 CENTRAL D

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

SACV 13-00786 CAS (ANX) NO.

[PROPOSED] PROTECTIVE ORDER

The Court having reviewed and considered the Stipulation Re: Protective Order filed by the parties in this matter on September 20, 2013, and good cause appearing, the Court finds and ORDERS as follows:

- On May 17, 2013, the government filed a complaint for On June 20, 2013, claimants filed a claim to the defendant \$548,937.00 in U.S. Currency.
- The discovery that the government intends to produce 2. to claimants in this matter includes personal identification

information for others, including but not limited to names,
Social Security numbers, bank account numbers, driver's license
numbers, addresses, phone numbers, and other similar information
(collectively "profile information").

- 3. Only claimants' counsel and claimants' counsel's employees and retained experts may review the unredacted discovery, including profile information, in preparation for trial and they may not use the unredacted profile information or any portion thereof except for the specific purpose of preparing or presenting a defense in this matter. Unredacted profile information produced to claimants' counsel shall be stored in a secure manner.
- 4. Claimants may review unredacted profile in claimants' counsel's office or the courthouse and only in the presence of claimants' counsel and/or claimants' counsel's agents.

 Claimants may not possess or in any way make a copy of any unredacted profile information at any time. Claimants may not take or remove from claimants' counsel's office or the courthouse unredacted profile information.
- 5. No one other than claimants' counsel, claimants' counsel's employees or retained experts, may review or possess a copy of any unredacted profile information at any time. If claimants' counsel deems it appropriate or necessary for a claimant to receive some or all of the profile information in this case, claimants' counsel may, without further Order of the Court, provide only redacted portions of the profile

information, where an Assistant United States Attorney or the Court approves the redactions. A willful violation of this Protective Order by claimants, their respective attorneys, or others may result in contempt of court proceedings or other civil or criminal sanctions.

6. Within 60 days of the conclusion of this matter, claimants' counsel, claimants' counsel's employees, and any retained experts, must either: (1) return all documents containing profile information to the government, as well as all copies, and all notes, memoranda or other documents containing profile information obtained from documents produced in discovery, or (2) destroy the documents containing profile information and certify in writing to counsel for the government that the documents have been destroyed.

IT IS SO ORDERED.

DATED: September 23, 2013

ARTHUR (NAKAZATO

THE HONORABLE CHRISTINA A. SNYDER UNITED STATES MAGISTRATE JUDGE