



1 Christopher D. Baker, hereby agree and stipulate as follows:

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

5 2. This Order pertains to all discovery provided to or  
6 made available to Defense Counsel as part of discovery in this  
7 case, and documents produced subsequent to the date of entry of  
8 this Order (hereafter, collectively known as the "discovery").

9 3. By signing this Stipulation and Protective Order,  
10 Defense Counsel agrees not to share any documents that contain  
11 Protected Information with anyone other than Defense Counsel  
12 attorneys, designated defense investigators, and support staff.  
13 Defense Counsel may permit LINDA EXPOSE to view unredacted  
14 documents in the presence of his attorney, defense investigators,  
15 and support staff. The parties agree that Defense Counsel,  
16 defense investigators, and support staff shall not allow LINDA  
17 EXOPSE to copy Protected Information contained in the discovery.  
18 The parties agree that Defense Counsel, defense investigators,  
19 and support staff may provide LINDA EXPOSE with copies of  
20 documents from which Protected Information has been redacted.

21 4. The discovery and information therein may be used only  
22 in connection with the litigation of this case and for no other  
23 purpose. The discovery is now and will forever remain the  
24 Government. Defense Counsel will return the discovery to the  
25 Government or certify that it has been destroyed at the  
26 conclusion of the case.

27 5. Defense Counsel will store the discovery in a secure  
28 place and will use reasonable care to ensure that it is not

1 disclosed to third persons in violation of this agreement.

2 6. Defense Counsel shall be responsible for advising LINDA  
3 EXPOSE, employees, and other members of the defense team, and  
4 defense witnesses of the contents of this Stipulation and Order.

5 7. In the event LINDA EXOPSE substitutes counsel,  
6 undersigned Defense Counsel agrees to withhold discovery from new  
7 counsel unless and until substituted counsel agrees also to be  
8 bound by this Order.

9 IT IS SO STIPULATED.

10 DATED: July 19, 2017

PHILLIP A. TALBERT  
United States Attorney

11

12

By: /s/ Christopher D. Baker  
CHRISTOPHER D. BAKER  
Assistant U.S. Attorney

13

14

15 DATED: July 19, 2017

By: /s/ Michael J. Aed  
Michael J. Aed  
Attorney for  
LINDA EXPOSE

16

17

18 IT IS SO ORDERED.

19

20

DATED: 7/19/17

21

22

  
\_\_\_\_\_  
U.S. MAGISTRATE JUDGE

23

24

25

26

27

28