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United States of America
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8 UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,
11 Plaintiff and Judgment Creditor,
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13 v.

14 VERONIKA WRIGHT,
Defendant and Judgment Debtor.
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16 BANK OF AMERICA, N.A.,
17 Garnishee.

Misc. No. 2:14-MC-0020-GEB-CKD

Case No. 2:09-CR-0066-GEB

**STIPULATION RE APPLICATION FOR A
FINAL ORDER OF GARNISHMENT
[SAFE DEPOSIT BOX]; ORDER**

18 Remaining in this garnishment action is the appropriate disposition of a safe deposit box in the
19 names of Judith and Robert Wright (the Wrights), the in-laws of defendant Veronika Wright. The
20 signatories hereto agree, upon the terms stated below, that the inspection, inventory and disposition of
21 the safe deposit box's (the Box) contents should proceed as follows:

22 1. The Wrights represent that they are the sole owners of the Box's contents. They further
23 represent the Box's exclusive contents are photographs of their personal items and household
24 furnishings; photographs not taken for commercial resale, but for recording their household items in the
25 event of a fire or other loss warranting the submission of an insurance claim. Finally, the Wrights affirm
26 that they accessed the Box one time after March 11, 2014, the date garnishee Bank of America (BoA)
27 acknowledged receipt of the United States' writ of garnishment. On March 18, 2014, the Wrights affirm
28 they accessed the Box, looking for their passports. They affirm the passports were not in the Box and

1 they affirm they did not remove anything from the Box. The Wrights affirm March 18, 2014, was the
2 last date they accessed the Box.

3 2. Within forty-five (45) days of the Court's order approving this stipulation, the Wrights
4 and a representative from the United States Attorney's Office shall, at a mutually agreeable date and
5 time, meet at the BoA branch where the Box is located to inspect the Box's contents.

6 3. Once the signatories agree upon a date and time, the Wrights will arrange with a BoA
7 representative to open the Box so the signatories may inspect and inventory the contents as well as any
8 Box access log that BoA maintains. The United States will prepare an inventory, which the Wrights will
9 date and sign. The Wrights authorize the United States to photograph the Box's contents. The
10 signatories agree the BoA representative will remain present during this process until the Box is locked
11 and resecured.

12 4. The United States will have ten (10) days following the inspection to determine its next
13 course of action. If the contents are as described in paragraph 1, below, the United States will request
14 that the Court terminate the writ concerning the Box. If the United States determines that some or all of
15 the contents are not as described, it will seek a further order from the Court within ten (10) days
16 following the inspection to determine its next course of action.

17 5. Pending further order of this Court, the Box shall remain locked and inaccessible to the
18 Wrights or any other persons or entities.

19 FOR THE UNITED STATES OF AMERICA:

20 Dated July 23, 2014

BENJAMIN B. WAGNER
United States Attorney

/s/Kurt A. Didier
KURT A. DIDIER
Assistant United States Attorney

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23 FOR JUDITH WRIGHT:

24 Dated _____

JUDITH WRIGHT

25 FOR ROBERT WRIGHT:

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27 Dated _____

ROBERT WRIGHT

1 **ORDER**

2 The Court, having reviewed the court files and the parties' Stipulation re Application for
3 Final Order of Garnishment (the Stipulation) and finding good cause therefore, hereby APPROVES
4 the Stipulation.

5 IT IS SO ORDERED.

6 Dated: July 29, 2014

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9 CAROLYN K. DELANEY
10 UNITED STATES MAGISTRATE JUDGE
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