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THE HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHI CHEN, PI-CHUAN CHANG, PI-SHAN CHANG, SHUQIN CHEN, XIANGLI CHEN, BINGXIN FAN, QIANG GUO, JINSONG HUANG, LIHUA HUANG, JIAPING JIANG, XIAOWEN JIN, CHENMIN LI, JINGHAN LI, YUN LIU, XIAOWEN PAN, XIAOLI SONG, JINGUO WANG, JIE XIONG, BIN XU, LU YU, QIANG ZHAO, YANYI ZHAO, WENQUAN ZHI, QUAN ZHOU, YIQIN CHEN, KE LI, MING LI, LEI WANG, ZHISHENG YUAN, MEILAN CHEN, XIAOBO CHEN, XIAOYANG DI, YAN GUO, BEI HUANG, MIN HUANG, ZHONGJIAO JIANG, QIANG LI, XIANKUN LI, XINGJUN LI, ZHIMENG LIU, CHENG LUO, YURONG NI, YUNFENG QING, YANHANG SHEN, TENG YAO SONG, LIPING SUN, LING TANG, SHIZHU TANG, CHEN YAN, YIJUN YIN, SHIZHE ZHANG, and ZHIHONG ZHANG,

Plaintiffs,

v.

U.S. BANK NATIONAL ASSOCIATION; QUARTZBURG GOLD, LP; ISR CAPITAL, LLC; IDAHO STATE REGIONAL CENTER, LLC; and SIMA MUROFF,

Defendants.

NO. 2:16-cv-01109-RSM

(CONSOLIDATED WITH 2:16-CV-01113 RSM)

**STIPULATION AND ORDER UNDER FEDERAL RULE OF EVIDENCE 502(D)**

1 Pursuant to Federal Rule of Evidence 502(d), Plaintiffs and Defendants Quartzburg Gold,  
2 LP, ISR Capital LLC, Idaho State Regional Center, LLC, Sima Muroff, and U.S. Bank National  
3 Association, who are all parties in this action, by and through their undersigned counsel, hereby  
4 stipulate and agree to, and respectfully request the entry of, a non-waiver order under Federal Rule  
5 of Evidence 502(d), as set forth herein.

6 Respectfully submitted this 27<sup>th</sup> day of August, 2018.

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***Attorneys for Defendants Quartzburg Gold, LP,  
ISR Capital LLC and Idaho State Regional  
Center, LLC***

1 **ORDER**

2 Based upon the foregoing Stipulation, IT IS ORDERED that pursuant to Federal Rule of  
3 Evidence 502(d), the inadvertent production of any documents or electronically stored information  
4 in this proceeding shall not, for the purposes of this proceeding or any other proceeding in any  
5 other court, constitute a waiver by the producing party of any privilege applicable to those  
6 documents or electronically stored information, including the attorney-client privilege, attorney  
7 work-product protection, or any other privilege or protection recognized by law. This Order shall  
8 be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d).

9 IT IS SO ORDERED this 28 day of August 2018.

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11 RICARDO S. MARTINEZ  
12 CHIEF UNITED STATES DISTRICT JUDGE