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14 Attorneys for Plaintiff

10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE DISTRICT OF ARIZONA

12 United States of America,  
13  
14 Plaintiff,

15 vs.

16 Luis Ortega and Jeremie Sowerby,  
17  
18 Defendants.

No. CR-23-01321-PHX-SMB

**UNITED STATES' UNOPPOSED  
MOTION FOR PROTECTIVE ORDER**

19 The United States moves for a protective order pursuant to Rule 16(d)(1) of the  
20 Federal Rules of Criminal Procedure to restrict dissemination of the discovery material  
21 produced in this case. The discovery material includes private information and personally  
22 identifying information (collectively "PII") relating to the defendants, witnesses, and  
23 victims in this case. Redacting the PII from all of the discovery material, however, is likely  
24 to inhibit the defense team in its ability to review and analyze discovery.

25 Accordingly, the United States requests that this Court enter a protective order:

- 26 1. Permitting the government to provide to defense counsel, without redaction,  
27 the PII of individuals to the extent that PII is present in discoverable materials;  
28 2. Permitting defense counsel to share materials containing PII with other

1 members of the defense team, including experts, investigators, and other professionals  
2 retained by defense counsel or the defendants to assist in the preparation of the defense;

3 3. Ordering all members of the defense team to safeguard and not disclose the  
4 PII provided to it, other than to the extent necessary to prepare the defense;

5 4. Permitting defense counsel to review materials containing PII with the  
6 defendants and potential witnesses to the extent necessary to prepare the defense;

7 5. Prohibiting the defendants and potential witnesses from retaining any  
8 materials containing PII during the course of the litigation unless defense counsel ensures  
9 that all PII has been redacted from the copies to be retained; and

10 6. Ordering the defense team to destroy, at the conclusion of this matter, all PII  
11 in its possession, except that defense counsel shall be allowed to retain materials containing  
12 PII until the time expires for all appeals, collateral attacks, other writs or motions  
13 challenging the conviction or sentence, and actions for professional malpractice.

14 Undersigned counsel has consulted counsel for Defendants Ortega and Sowerby,  
15 who do not object to entry of the proposed protective order.

16 Respectfully submitted this 13th day of November, 2023.

17 GARY M. RESTAINO  
18 United States Attorney  
19 District of Arizona

20 s/ Lindsay Short  
21 PETER SEXTON  
22 LINDSAY SHORT  
23 Assistant U.S. Attorney

24 **CERTIFICATE OF SERVICE**

25 I hereby certify that on November 13, 2023, I electronically transmitted the attached  
26 document to the Clerk's Office using the CM/ECF System for filing a copy to the following  
27 CM/ECF registrant: All Counsel of Record.

28 s/ Lindsay L. Short  
U.S. Attorney's Office