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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,  
Plaintiff,  
vs.  
Luis Ortega and Jeremie Sowerby,  
Defendants.

No. CR-23-01321-PHX-SMB  
**[PROPOSED] PROTECTIVE ORDER**

Pursuant to Federal Rule of Criminal Procedure 16(d)(1), the United States' motion, no objection from defendants, and good cause appearing,

IT IS HEREBY ORDERED that the United States' Unopposed Motion for Protective Order is GRANTED.

IT IS FURTHER ORDERED that:

1. The United States may disclose to defense counsel, without redaction, the private information and personally identifying information (collectively "PII") of individuals to the extent that PII is present in discoverable materials. PII includes, but is not limited to, addresses, telephone numbers, dates of birth, social security numbers, and financial information.
2. Defense counsel may share materials containing PII with members of the defense team, including experts, investigators, and other professionals retained by defense counsel or the defendants to assist in the preparation of the defense.
3. The defense team shall safeguard and shall not disclose the PII provided to

1 them, other than to the extent necessary to prepare the defense.

2 4. Defense counsel may review materials containing PII with the defendants  
3 and potential witnesses to the extent necessary to prepare the defense.

4 5. The defendants and potential witnesses shall not be allowed to retain any  
5 materials containing PII during the course of the litigation unless defense counsel ensures  
6 that all PII has been redacted from the copies to be retained.

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

11 IT IS FURTHER ORDERED that excludable delay under 18 U.S.C. § 3161(h)  
12 \_\_\_\_\_ will commence on \_\_\_\_\_ for a total of  
13 \_\_\_\_\_ days

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